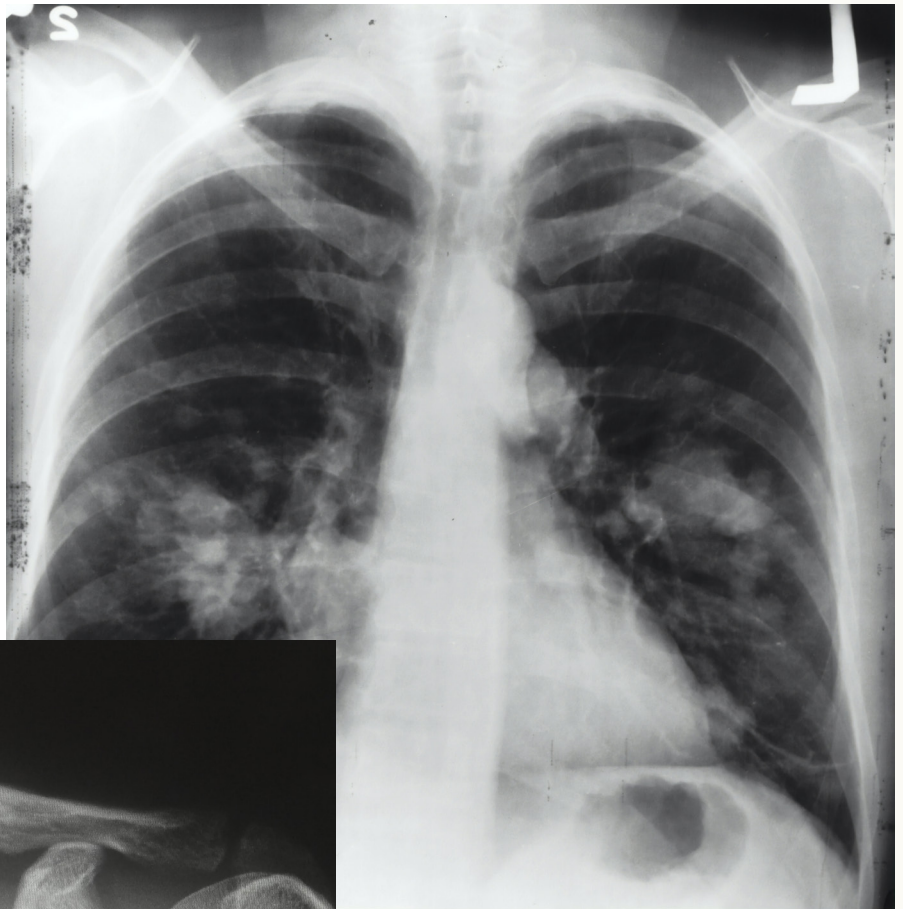




Developing Your Workplace Injury & Illness Prevention Program



June 2024

This document is neither a substitute for, nor a legal interpretation of, the occupational safety and health regulations. Readers must refer directly to title 8 of the California Code of Regulations and the Labor Code for details regarding the regulations' scopes, specifications, and exceptions, and other requirements that may apply to their operations.

In California every employer has a legal obligation to provide and maintain a safe and healthful workplace for employees, according to the California Occupational Safety and Health Act of 1973. As of 1991, a written, effective Injury and Illness Prevention Program (IIPP) is required for every California employer.

This guide describes the employers' responsibilities in establishing, implementing, and maintaining an IIPP, as well as making the written IIPP available to their employees. It also outlines steps that can be taken to develop an effective IIPP that helps assure the safety and health of employees while on the job.

The term "employer" as used in the Cal/OSHA Act includes any person or corporation, the State and every State agency, every county or city or district and public agency therein, which has any person engaged in or permitted to work for hire, except for household services.

This guide is designed to help employers provide better workplace protection for their employees, and to reduce losses resulting from accidents and injuries. The material in this publication is based on principles and techniques developed by occupational safety and health professionals nationwide. It is intended to provide guidance, rather than prescribe requirements.

Workplace safety and health information is available online at:

- General information: www.dir.ca.gov/dosh
- Cal/OSHA regulations: www.dir.ca.gov/samples/search/query.htm
- Cal/OSHA safety and health publications: www.dir.ca.gov/dosh/puborder.asp
- Cal/OSHA etools: www.dir.ca.gov/dosh/etools/etools.htm

Cal/OSHA Consultation Services offers free telephone, email, and onsite assistance. Find a local office online (www.dir.ca.gov/dosh/consultation.html) or with the contact information listed in the back of this document.

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**ACCIDENT
AHEAD**

Why Have a Workplace Injury and Illness Prevention Program?

Taking risks is a part of running a business, particularly for small business owners. You take risks in product development, marketing, and advertising in order to stay competitive. Some risks are just not worth the gamble. One of these is risking the safety and health of those who work for you.

Accidents Cost Money



Direct Costs

Indirect & Hidden Costs

Safety organizations, states, small business owners and major corporations alike now realize that the actual cost of a lost workday injury is substantial. For every dollar you spend on the direct costs of a worker's injury or illness, you will spend much more to cover the indirect and hidden costs. Consider what one lost workday injury would cost you in terms of:

- Productive time lost by an injured employee.
- Productive time lost by employees and supervisors attending the accident victim.
- Clean up and startup of operations interrupted by the accident.

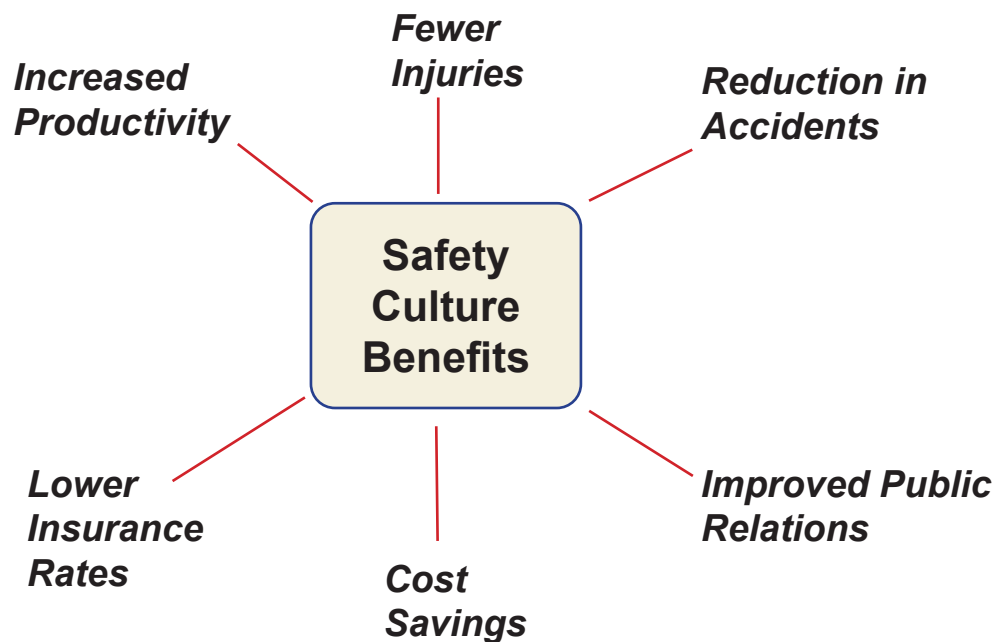
- Time to hire or retrain other individuals to replace the injured worker until their return.
- Time and cost for repair or replacement of any damaged equipment or materials.
- Cost of continuing all or part of the employee's wages, in addition to compensation.
- Reduced morale among your employees, and perhaps lower efficiency.
- Increased workers' compensation insurance rates.
- Cost of completing paperwork generated by the incident.

Controlling Losses



If you would like to reduce the costs and risks associated with workplace injuries and illnesses, you need to address safety and health right along with production.

Setting up an IIPP helps you do this. In developing the IIPP, you identify what has to be done to promote the safety and health of your employees and worksite, and you outline policies and procedures to achieve your safety and health goals.



Cal/OSHA Injury & Illness Prevention Program

In California every employer is required by law (Labor Code Section 6400) to provide a safe and healthy workplace for their employees. Title 8 (T8) of the California Code of Regulations (CCR) requires every California employer to have an effective IIPP in writing that must be in accord with T8 CCR section 3203 of the General Industry Safety Orders. Additional requirements in the following T8 CCR Safety Order sections address specific industries:

- Construction—section **1509**
- Petroleum—sections **6507, 6508, 6509, 6760, 6761, and 6762**
- Ship Building, Ship Repairing, Ship Breaking—section **8350**
- Tunnels—section **8406, 8407, 8408, and 8409**

What is an Injury & Illness Prevention Program?

Your IIPP must be a written plan that includes procedures and is put into practice. The following elements are required:

1. A person (or persons) with authority and responsibility for implementing the IIPP is identified.
2. A system for ensuring employees comply with safe and health work practices.
3. A system for communicating with employees in a form readily understandable by all affected.
4. Procedures for identifying and evaluating workplace hazards.
5. Procedures to investigate occupational injury or illness.
6. Procedures for correcting unsafe or unhealthy conditions, work practices and procedures.
7. Provide employee training and instruction.
8. Procedures to allow employee access to the IIPP.
9. Recordkeeping and documentation.

Management Commitment, Assignment of Responsibilities, and Ensuring Employee Compliance

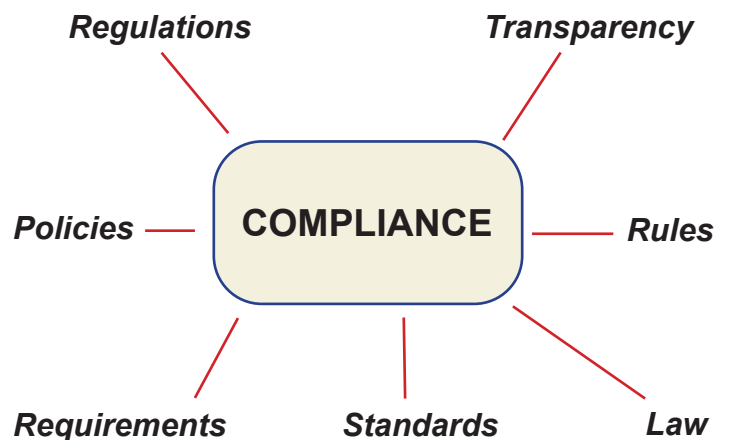
Your commitment to safety and health shows in every decision you make and every action

you take. Your employees will respond to that commitment.

The person or persons with the authority and responsibility for your safety and health program must be identified and given management's full support. You can demonstrate your commitment through your personal concern for employee safety and health and by the priority you place on these issues.

If you want maximum production and quality, you need to control potential workplace hazards and correct hazardous conditions or practices as they occur or are recognized.

You must commit yourself and your company by building an effective IIPP and integrating it into your entire operation.



This commitment must be backed by strong organizational policies, procedures, incentives, and disciplinary actions as necessary to ensure employee compliance with safe and healthful work practices. They must include:

- Establishment of workplace objectives for accident and illness prevention, like those you establish for other business functions such as sales or production. Be very careful that the objectives you set do not unintentionally discourage reporting of accidents, injuries, or illnesses.
- Emphasis on your staff's safety and health responsibilities and recognition by your supervisors and employees that they are accountable. Advise your management staff that they will be held accountable for the unsafe actions of the employees working under them, and then back it up with firm action. At the same time, recognize those who routinely abide by workplace policy and procedures, and consistently engage in safe behavior.
- A means for encouraging employees to report unsafe conditions with assurance that management will take action.
- Allocation of company resources—financial, material and personnel—for:
 - Identifying and controlling hazards in new and existing operations and processes, and potential hazards.
 - Installing engineering controls.
 - Purchasing personal protective equipment (PPE).
 - Promoting and training employees in safety and health.
- Setting a good example! If, for instance, you require PPE to be worn in a specific area, then you and other management wear that PPE in that area.

If you and your management team do not support and participate in the IIPP, you are doomed to failure from the start. It is especially important for

plant supervisors and field superintendents to set a good example.

Safety Communications



Your IIPP must include a system for communicating with employees—in a form readily understandable by all affected employees—on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal.

While this section does not require employers to establish labor-management safety and health committees, it is an option you should consider. If you choose to do so, remember that employers who elect to use a labor-management safety and health committee to comply with the communication requirements are presumed to be in substantial compliance if the committee:

- Meets regularly but not less than quarterly.
- Prepares and makes available to affected employees written records of the safety and health issues discussed at the committee meetings and maintained for review by Cal/OSHA upon request.
- Reviews results of the periodic scheduled worksite inspections.
- Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, illness, or exposure to hazardous substances, and where appropriate, submits suggestions to management for the prevention of future incidents.
- Reviews investigations of alleged hazardous conditions brought to the attention of any committee member. When determined necessary by the committee, it may conduct

its own inspection and investigation to assist in remedial solutions.

- Submits recommendations to assist in the evaluation of employee safety suggestions.
- Upon request of Cal/OSHA, verifies abatement action taken by the employer to abate citations issued by Cal/OSHA.

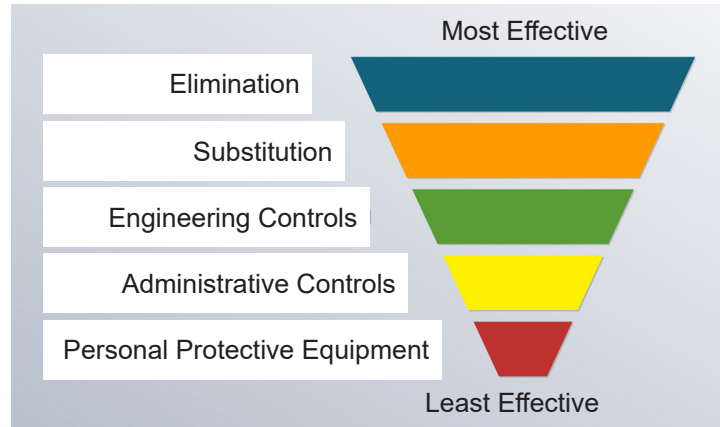
If your employees are not represented by an agreement with an organized labor union, and part of your employee population is unionized, the establishment of labor-management committees is considerably more complicated.

If you elect not to use labor-management safety and health committees, be prepared to formalize and document your required system for communicating with employees.

Here are some helpful safety communication tips:

- Your communication system must be in a form readily understandable by all affected employees. This means you must be prepared to communicate with employees in a language they can understand, and if an employee cannot read in any language, you must communicate with them orally in a language readily understandable. Your communication system must be designed to encourage employees to inform the employer of hazards at the workplace without fear of reprisal. It must be a two-way system of communication.
- Schedule general employee meetings where safety is freely and openly discussed by those present. Such meetings must be regular, scheduled, and announced to all employees so that maximum employee attendance can be achieved. Remember to do this for all shifts. Many employers find it cost effective to hold such meetings at shift change time, with a brief overlap of schedules to accomplish the meetings. If properly planned, effective safety meetings can be held in a 15- to 20-minute time frame. Concentrate on:
 - Occupational accident and injury history at your own worksite, with possible comparisons to other locations in your company.
 - Feedback from the employee group.
 - Guest speakers from your worker's compensation insurance carrier or other agencies concerned with safety.
 - Brief audio-visual materials that relate to your industry.
 - Control of the meetings.
 - Stress that the purpose of the meeting is safety. Members of management should attend this meeting.
- Training programs are excellent vehicles for communicating with employees.
- Posters and bulletins can be very effective ways of communicating with employees. Useful materials can be obtained from Cal/OSHA, your workers' compensation insurance carrier, the National Safety Council or other commercial and public service agencies.
- Newsletters or similar publications devoted to safety are also very effective communication devices. If you cannot devote resources to an entire publication, make safety a featured item in every issue of your company newsletter.
- A safety suggestion box can be used by employees, anonymously if desired, to communicate their concerns to management.
- Publish a brief company safety policy or statement informing all employees that safety is a priority issue with management and urge employees to actively participate in the IIPP for the common good of all concerned. (Model policy statements are found in Appendix A.)
- Communicate your concerns about safety to all levels of management.
- Document all communication efforts, as you will be required to demonstrate that a system of effective communication is in place.

Hazard Assessment & Control



Periodic inspections and procedures for correction and control provide a method of identifying existing or potential hazards in the workplace and eliminating or controlling them. Hazard control is the heart of an effective IIPP.

If hazards occur or recur, this reflects a breakdown in the hazard control system. The hazard control system is also the basis for developing safe work procedures and injury and illness prevention training.

The required hazard assessment survey of your establishment, when first developing your IIPP, must be made by a qualified person. This survey can provide the basis and guide for establishing your hazard assessment and control system. The survey produces knowledge of hazards that exist in the workplace, and conditions, equipment and procedures that could be potentially hazardous.

An effective hazard control system will identify:

- Hazards that exist or develop in your workplace.
- How to correct those hazards.
- Steps you can take to prevent their recurrence.

If you have an effective system for monitoring workplace conditions:

- You will be able to prevent many hazards from occurring through scheduled and documented self-inspections. Make sure established safe work practices are being followed and those unsafe conditions or procedures are identified and corrected properly. Scheduled inspections are in addition to the everyday safety and health checks that are part of the routine duties of managers and supervisors.

The frequency of these inspections depends on several issues, such as:

- The operations involved.
- The magnitude of the hazards.
- The proficiency of employees.
- Changes in equipment or work processes.
- The history of work-place injuries and illnesses.

Inspections must be conducted by personnel who, through experience or training, are able to identify actual and potential hazards and understand safe work practices.

Written inspection reports must be reviewed by management and/or the safety committee. The review must assist in prioritizing actions

and verify completion of previous corrective actions. Overall inspection program results should be reviewed for trends.

Know which Cal/OSHA safety orders contained in title 8 of the California Code of Regulations apply to your workplace and use them to identify potential hazards. A Cal/OSHA Consultation Service consultant or outside consultant can assist you in identifying safety orders applicable to your work.

- Your employees must be encouraged to tell you or their supervisors of possibly hazardous situations, knowing their reports will be given prompt and serious attention without fear of reprisal. When you let them know that the situation was corrected (or why it was not hazardous), you create a system by which your employees continue to report hazards promptly and effectively.
- Workplace equipment and personal protective equipment must be maintained in safe and good working condition. In addition to what is required by Cal/OSHA standards, your own IIPP monitors the operation of workplace equipment, and can also verify that routine preventive maintenance is conducted, and personal protective equipment is reliable. This makes good safety sense, and proper maintenance can prevent costly breakdowns and undue exposures.

Note that T8CCR [section 3380](#) establishes additional requirements when it comes to identifying hazards and corresponding personal protective equipment that may be required.

- Hazards must be corrected as soon as they are identified. For any that can't be immediately corrected, set a target date for correction based on such considerations as:
 - The probability and severity of an injury or illness resulting from the hazard.
 - The availability of needed equipment, materials and/or personnel.

- Time for delivery, installation, modification or construction.
- Training periods.

Provide interim protection to employees who need it while correction of hazards is proceeding. A written tracking system such as a log helps you monitor the progress of hazard correction.

- You must review and prioritize your IIPP based on the severity of the hazard.

Accident Investigation



A primary tool you must be using in an effort to identify and recognize the areas responsible for accidents is a thorough and properly completed accident investigation. It must be in writing and adequately identify the cause(s) of the accident or near-miss occurrence.

Accident investigations must be conducted by trained individuals, and with the primary focus of understanding why the accident or near miss occurred and what actions can be taken to preclude recurrence. In large organizations this responsibility may be assigned to the safety director. In smaller organizations the responsibility may lie directly with the supervisor responsible for the affected area or employee.

Questions to ask in an accident investigation include:

- **What happened?**

The investigation must describe what took place that prompted the investigation, such as:

- An injury to an employee.
- An incident that caused a production delay.
- Damaged material.
- Any other conditions recognized as having a potential for losses or delays.

- **Why did the incident happen?**

The investigation must obtain all the facts surrounding the occurrence, such as:

- What caused the situation to occur?
- Who was involved?
- Was/were the employee(s) qualified to perform the functions involved in the accident or near miss?
- Were they properly trained?
- Were proper operating procedures established for the task involved?
- Were procedures followed, and if not, why not?
- Where else this or a similar situation might exist, and how it can be corrected?

- **What should be done?**

The person conducting the investigation must determine which aspects of the operation or processes require additional attention. It is important to note that the purpose here is not to establish blame, but to determine what type of constructive action can eliminate the cause(s) of the accident or near miss.

- **What action has been taken?**

Action already taken to reduce or eliminate the exposures being investigated must be noted, along with those remaining to

be addressed. Any interim or temporary precautions must also be noted. Any pending corrective action and reason for delaying its implementation must be identified.

Corrective action must be identified in terms of not only how it will prevent a recurrence of the accident or near miss, but also how it will improve the overall operation. This will assist the investigation in selling solutions to management. The solution should be a means of achieving not only accident control, but also total operation control.

If you have a safety and health committee, its members must review investigations of all accidents and near-miss incidents to assist in recommending appropriate corrective actions to prevent a similar recurrence.

Thorough investigation of all accidents and near misses will help you identify causes and needed corrections, and can help you determine why accidents occur, where they happen, and any accident trends. Such information is critical to preventing and controlling hazards and potential accidents.

Safety Planning, Rules & Work Procedures

Planning for safety and health is an important part of every business decision, including purchasing, engineering, changes in work processes, and planning for emergencies. Your safety and health planning are effective when your workplace has several things in place, such as:

- Rules written to apply to everyone and addressing areas such as personal protective equipment, appropriate clothing, expected behavior, and emergency procedures. You and your employees must periodically review and update all rules and procedures to make sure they reflect present conditions.

Rules and procedures must be written for new exposures when they are introduced into the workplace.

- Safe and healthful work practices developed for each specific job.
- Discipline and recognition procedures to help ensure that safety rules and work procedures are put into practice and enforced. Positive reinforcement procedures such as employee recognition programs must provide positive motivation for compliance with safety rules and procedures. Be sure recognition programs do not unintentionally discourage employees from reporting accidents, injuries, or illnesses.
- A written plan for emergency situations. Your plan must include a list of emergencies that could arise and a set of procedures in response to each situation. Some emergency procedures, such as those covering medical emergencies or fire evacuation, are mandated by Cal/OSHA regulations.

If you have operations involving hazardous substances, procedures or processes, you must designate emergency response teams to be specifically trained and equipped to handle possible imminent hazards.

Safety & Health Training



Training is one of the most important elements of any IIPP. It allows employees to learn their job properly, brings new ideas into the workplace, reinforces existing ideas and practices, and puts your IIPP into action.

Your employees benefit from safety and health training through fewer work-related injuries and illnesses, and reduced stress and worry caused by exposure to hazards.

You benefit from reduced workplace injuries and illnesses, increased productivity, lower costs, higher profits, and a more cohesive and dependable work force.

An effective IIPP includes training for both supervisors and employees. Training for both is required by certain Cal/OSHA safety orders.

You may need outside professionals to help you develop and conduct your required training program. Help is available from the Cal/OSHA Consultation Service, your workers' compensation insurance carrier, private consultants, and vendor representatives.

Outside trainers should be considered temporary. Eventually you will need your own in-house training capabilities so you can provide training that is timely and specific to the needs of your workplace and your employees.

To be effective and also meet Cal/OSHA requirements, your training program needs to:

- Let your supervisors know:
 - They are key figures responsible for establishment and success of your IIPP.
 - The importance of establishing and maintaining safe and healthful working conditions.
 - They are responsible for being familiar with safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures and work practices for controlling exposure to those hazards.
 - How to convey this information to employees by setting good examples, instructing them, making sure they fully understand, and follow safe procedures.
 - How to investigate accidents and take corrective and preventive action.
- Let your employees know:
 - The success of the company's IIPP depends on their actions as well as yours.

Developing Your Workplace Injury & Illness Prevention Program

- The safe work procedures required for their jobs and how these procedures protect them against exposure.
- When personal protective equipment is required or needed, how to use it and maintain it in good condition.
- What to do if emergencies occur in the workplace.

An effective IIPP requires proper job performance by everyone in the workplace. As the employer, you must ensure that all employees are knowledgeable about the materials and equipment they are working with, what known hazards are present and how they are controlled.

Each employee needs to understand that:

- No employee is expected to undertake a job until they have received instructions on how to do it properly and safely and are authorized to perform the job.
- No employees should undertake a job that appears to be unsafe.
- No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with them safely.

- Mechanical safeguards must always be in place and kept in place.
- Employees are to report to a superior or designated individual all unsafe conditions encountered during work.
- Any work-related injury or illness suffered, however slight, must be reported to management at once.
- Personal protective equipment must be used when and where required, and properly maintained.

Your supervisors must recognize that they are the primary safety trainers in your organization. Encourage and help them by providing supervisory training. Many community colleges offer management training courses at little or no cost.

You as the employer are required under Cal/OSHA standards to establish and carry out a formal training program. A professional training person, an outside consultant, or your supervisors may provide injury and illness prevention training to your employees.

This program must, at a minimum, provide training and instruction:

- To all employees when your IIPP is first established.
- To all new employees.
- To all employees given new job assignments for which training has not been previously received.
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace and present a new hazard.
- Whenever you or your supervisors are made aware of a new or previously unrecognized hazard.
- For all supervisors to ensure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed.



Employee Access to the Injury and Illness Prevention Program



You are required to develop and communicate procedures to allow employees to exercise their right to access your IIPP. You can provide access by doing one of the following:

- Provide access to the written IIPP in a reasonable time, place, and manner, but in no event later than five business days after you receive a request for access from an employee or designated representative. Only if the requestor agrees are you allowed to provide an electronic copy of the IIPP. Absent such an agreement, you must provide a paper copy.

The employee or designated representative is entitled to one free printed copy per year. You may charge reasonable, nondiscriminatory reproduction costs for printing if the employee or designated representative requests additional copies within one year of the previous request and the IIPP has not been updated with new information since the prior copy was provided.

- Provide unobstructed access to the IIPP through a company server or

website that allows an employee to review, print, and email the current version of the IIPP. “Unobstructed access” means that the employee, as part of their regular work duties, predictably and routinely uses the electronic means to communicate with management or coworkers.

With respect to both methods of providing access, the copy provided to the employee or designated representative need not include any of the records of the steps taken to implement and maintain the written IIPP—you are only required to provide a copy of the IIPP itself. Additionally, if you have distinctly different and separate operations with distinctly separate and different IIPP, you may limit access to those programs applicable to the employee requesting it.

A “designated representative” means any individual or organization to whom an employee gives written authorization to exercise a right of access. A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the company IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.
- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

Whichever method you employ to provide access, you must communicate that procedure to your employees and their corresponding right to access the IIPP.



Getting Started on Your Injury & Illness Prevention Program

Put the elements (see “What is an Injury & Illness Prevention Program?” on page 2) of an IIPP together and come up with a plan to suit your individual workplace. Decide exactly what you want to accomplish, and determine what steps are necessary to achieve your goals.

Then plan out how and when each step will be carried out and who will do it and put this plan in writing. In developing the plan, consider your company’s immediate needs and provide for ongoing worker protection.

If you have difficulty deciding where to begin, contact the Cal/OSHA Consultation Service, your workers’ compensation insurance carrier, private consultants, and vendor for assistance. They can help you determine what is needed to make your IIPP effective.

The following sections describe the process you might go through in establishing an IIPP. Remember that you do not have to do everything described in this manual at once.

Assign Responsibilities

Decide who in your company will be given responsibility and authority to manage this IIPP. In many cases, it’s the owner.

Sometimes the plant manager or a ranking member of the management team is the one to develop and set up the IIPP. It could even be an engineer, personnel specialist or other staff member.

The person assigned must be identified by name or job title in your IIPP. If it’s by job title, then make sure employees know who that person is. Your IIPP’s success hinges on the individual you choose, and they cannot succeed without your full cooperation and support. Remember, though, that even when you appoint someone as your safety manager and delegate authority to manage the IIPP, the ultimate responsibility for safety and health in your workplace still rests with you.

When considering responsibility, do not forget to include all of your employees. Give each employee training and responsibility to follow your safety and health procedures, and to recognize and report hazards in their immediate work area.

All employees must be informed of their responsibility to comply with safe and healthy work practices, and that failure to do so may result in disciplinary action, per Labor Code Section 6401.7(a)(6).

Look at What You Have

Before you make any changes in your safety and health operations, gather as much information as possible about current conditions at your workplace and work practices that are already part of your IIPP. This information can help you identify workplace problems and determine what’s involved in solving them.

Assessment of your workplace must be conducted by the person designated with the responsibility, and/or a professional occupational safety and health consultant. It consists of the activities describe below.

Safety & Health Survey



The first step is a comprehensive safety and health survey of your facility to identify existing or potential safety and health hazards.

This survey must be documented if made for the purpose of establishing an IIPP, and must evaluate workplace conditions with respect to issues such as:

- Safety and health regulations.
- Generally recognized safe work practices.
- Physical hazards.
- Use of any hazardous materials.
- Employee work habits.
- Discussion of safety and health problems with employees.

Your safety and health survey includes:

- Equipment—Make a list of your equipment and tools, including the principal locations of their use. Special attention should be given to inspection schedules, maintenance activities and your facility's layout.
- Chemicals—Make a list of all chemicals used in your workplace, obtain safety data sheets on the materials used, and identify

where they are used. This will also be an initial component of your chemical Hazard Communication Program, as required by T8CCR [section 5194](#).

- Work practices—Detail specific work practices associated with equipment, tools and chemical use. Special attention must be given to PPE, guarding, ventilation, emergency procedures, and use of appropriate tools.
- Cal/OSHA Standards—Review standards applicable to your type of operation, equipment, processes, materials, and the like. These standards are minimum requirements for workplace safety and health. Most workplaces come under title 8, California Code of Regulations, General Industry Safety Orders. If you are involved with construction, petroleum, mining or tunneling, you will need the specific standards applicable to that industry as well.
- Workplace violence—Employers covered by California Labor Code 6401.9 must include workplace violence in their hazard survey and establish, implement, and maintain a written Workplace Violence Prevention Plan. This can be a separate document or made part of the IIPP.

Workplace Assessment

The next activity is an evaluation of your existing IIPP to identify areas that may be working well and those that may need improvement. For instance, examine your company's:

- Accident, injury or illness data.
- Workers' compensation costs.
- Rates of employee turnover or absenteeism.
- Information on safety and health activities, ongoing or previously tried.
- Company policy statements.
- Rules—both work and safety.

- Guidelines for proper work practices and procedures.
- Records of training programs.
- Compliance with requirements of California's Right to Know Law and Hazard Communications Standard.
- Employee capabilities—make an alphabetical list of all employees, showing the dates they were hired, what their jobs are, and their experience and training. Special attention should be given to new employees and employees with handicaps.
- Joint labor-management safety and health committee activities.
- Other safety-related programs.

Review & Compare

After all the facts are gathered, look at how the information on your workplace corresponds with the standards, and with the critical components of an IIPP:

- A person (or persons) with authority and responsibility for implementing the IIPP is identified
- A system for ensuring employees comply with safe and healthy work practices.
- A system for communicating with employees in a form readily understandable by all affected.
- Procedures for identifying and evaluating workplace hazards.
- Procedures to investigate occupational injury or illness.
- Procedures for correcting unsafe or unhealthy conditions, work practices and procedures.
- Provide employee training and instruction.
- Procedures to allow employee access to the IIPP.
- Recordkeeping and documentation.

You may find that you are already well on your way toward having a good IIPP. Compare what you have with Appendix B.

Develop an Action Plan



An action plan is a specific, written description of problems and solutions—it can and should be changed to correspond with changes in the workplace.

A good action plan has two parts:

1. An overall list of major changes or improvements needed to make your IIPP effective. Assign each item a priority and a target date for completion and identify the person who will monitor or direct each action.
2. Taking each major change or improvement listed and working out a specific plan for making that change. Write out:
 - What you want to accomplish.
 - The steps required.
 - Who would be assigned to do what.
 - When you plan to be finished. This part of the action plan helps you keep track of IIPP improvement so that details do not slip through the cracks.

Take Action

Put your plan into action, beginning with the item assigned highest priority. Make sure it is realistic and manageable, then address the steps you have written out for that item.

You can, of course, work on more than one item at a time. Priorities may change as other needs are identified, or as your company's resources change.

Open communication with your employees is crucial to the success of your efforts. Their cooperation depends on understanding what the IIPP is all about, why it is important to them, and how it affects their work. The more you do

to keep them informed of the changes you are making, the smoother your transition will be.

By putting your action plan into operation at your workplace, you will have taken a major step toward having an effective IIPP. Remember, an IIPP is a plan put into practice.

Maintain Your Program and Ensure Employee Access to It

Schedule a review—quarterly, semiannually or annually—to look at each critical component in your IIPP, to determine what is working well and what changes, if any, are needed. When you identify needs that should be addressed, you have the basis for new safety and health objectives for IIPP improvement.

Make sure you have a process in place that ensures employees can access your IIPP, either by providing them with a hard copy or electronic means and communicate to your employees both their right to have access to the IIPP and how to go about exercising the right to access.

Safety & Health Recordkeeping

No operation can be successful without adequate recordkeeping, which enables you to learn from past experience and make corrections for future operations. Records of accidents, work-related injuries, illnesses and property losses serve a valuable purpose.

Under Cal/OSHA recordkeeping requirements, information on accidents is gathered and stored. Upon review, causes can be identified and control procedures instituted to prevent the illness or injury from recurring. Keep in mind that any inspection of your workplace may require you to demonstrate the effectiveness of your IIPP.

Injury & Illness Records

Injury and illness recordkeeping requirements under Cal/OSHA require a minimum amount of paperwork.

These records give you one measure for evaluating the success of your safety and health activities. Success would generally mean a reduction or elimination of employee injuries or illnesses during a calendar year.

Five important steps are required by the Cal/OSHA recordkeeping system:

1. Each employer (unless exempt by size or industry) must record each fatality, injury, or illness that is work-related, is a new case, or meets one or more of the general recording criteria specified in T8CCR, [section 14300](#).
2. Record each injury or illness on the Cal/OSHA Log of Occupational Work-Related Injuries and Illnesses (Form 300) according to its instructions.
3. Prepare an Injury and Illness Incident Report (Form 301), or equivalent.
4. Annually review and certify the Cal/OSHA Form 300 and post the Summary of Work-Related Injuries and Illnesses (Form 300A) no later than February 1 and keep it posted where employees can see it until April 30.
5. Maintain the last five years of these records in your files.

NOTE: Additional information on recordkeeping can be found on the [Cal/OSHA Publications](#) webpage.

During the year, regularly review these records to see where your injuries and illnesses are occurring. Look for any patterns or repeat situations. These records can help you identify hazardous areas in your workplace and pinpoint where immediate corrective action is needed.

Since the basic Cal/OSHA records are for recordable injuries and illnesses only, you might expand your system to include all incidents relating to workplace safety and health, even those where no injury or illness resulted. Such information can assist you in pinpointing unsafe acts, conditions or procedures.

Exposure Records

Cal/OSHA standards concerning toxic substances and hazardous exposures require records of employee exposure to these substances and sources, physical examination reports, employment records, and other information.

Employers using any regulated carcinogens have additional reporting and recordkeeping requirements. See T8 CCR [Article 110](#) for details.

Documentation of Your Activities

Essential records, including those legally required for workers' compensation, insurance audits, and government inspections, must be maintained for as long as required.

For most employers, Cal/OSHA standards also require that you keep records of steps taken to establish and maintain your IIPP. They must include:

- Records of scheduled and periodic inspections as required by the standard to identify unsafe conditions and work practices.

The documentation must include:

- The name of the person(s) conducting the inspection.
- The unsafe conditions and work practices identified.
- The action taken to correct the unsafe conditions and work practices.

The records are to be maintained for at least one year. However, employers with fewer than 10 employees may elect to maintain the inspection records only until the hazard is corrected.

- Documentation of safety and health training required by standards for each employee. The documentation must specifically include:
 - Employee name or another identifier.
 - Training dates.

- Type(s) of training.
- The name of the training provider.

These records must also be kept for at least one year, except that training records of employees who have worked for less than one year for the employer need not be retained beyond the term of employment if they are provided to the employee upon termination of employment.

Also, employers with fewer than 10 employees can substantially comply with the documentation provision by maintaining a log of instructions provided to the employee with respect to the hazards unique to the employees' job assignment when first hired or assigned new duties. Some relief from documentation is available for employers with fewer than 20 employees who are working in industries that are on the Department of Industrial Relations (DIR's) designated list of low-hazard industries, and for employers with fewer than 20 employees who are not on DIR's list of high-hazard industries and who have a Workers' Compensation Experience Modification Rate of 1.1 or less. For these industries, written documentation of the IIPP may be limited to:

- Written documentation of the identity of the person or persons with authority and responsibility for implementing the IIPP.
- Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices.
- Written documentation of training and instruction.

Keeping such records fulfills your responsibilities under T8CCR section 3203. It also affords an efficient means to review your current safety and health activities for better control of your operations, and to plan future improvements.

Model Programs

Four model Injury and Illness Prevention Programs are available from Cal/OSHA. They are:

- **Model Injury and Illness Prevention Program for High-Hazard Employers**
- **Injury and Illness Prevention Model Program for Non-High-Hazard Employers**
- **Model Injury and Illness Prevention Program for Employers with Seasonal or Intermittent Workers**
- **Model Injury and Illness Prevention Program for Construction**

There are no requirements to use these model programs. However, any employer in an industry that has been determined by Cal/OSHA as being non-high-hazard and who adopts, posts, and implements the Injury and Illness Prevention Model Program for Non-High-Hazard Employers in good faith is not subject to assessment of a civil penalty for a first violation of T8 CCR section 3203.

Any employer in an industry that has been determined by Cal/OSHA to historically utilize intermittent or seasonal employees and who adopts and implements the Injury and Illness Prevention Model Program for Employers with Intermittent Workers in good faith is deemed to be in compliance with the IIPP requirements of T8CCR section 3203.

Proper use of these model programs requires the IIPP administrator to carefully review the requirements for each of the required IIPP

elements, edit and fill in the appropriate blank spaces and check those items that are applicable to your workplace. Sample forms for hazard assessment and correction, accident/exposure investigation, and worker training and instruction are provided with these model programs. Also provided are lists of training subjects and workplace checklists.

As always, these model programs must be maintained by the employer in order to be effective.

Contact the nearest Cal/OSHA Consultation Service office listed at the back of this publication to learn more about the model programs and obtain information on the different industry lists.

Other Hazard-Specific Programs, Plans, or Procedures

Besides T8 CCR section 3203 Injury and Illness Prevention Program, the following are other regulations that also require written hazard-specific exposure control programs, procedures, or plans that can be incorporated into your IIPP, or maintained as separate plans:

- COVID-19 Prevention: **section 3205**
- Violence Prevention (General industry): Labor Code sections **6401.7** and **6401.9**
- Violence Prevention (Healthcare): **section 3342**
- Hotel Housekeeping: **section 3345**

- Heat Illness Prevention (outdoor): [section 3395](#)
- Health Care Worker Back and Musculoskeletal Injury Prevention: [section 5120](#)
- Aerosol Transmissible Diseases
 - General (dental and specialty medical clinics): [section 5199](#)
 - Zoonotic: [section 5199.1](#)

Cal/OSHA has developed the following model programs, procedures or plans for those employers that wish to develop separate hazard-specific documents:

- [COVID-19 Prevention](#)
- [Violence Prevention](#) (non-healthcare)
- [Hotel Housekeeping](#)
- [Heat Illness Prevention](#) (outdoor)

Section 5199: Outpatient dental clinics are exempt from section 5199 if they meet certain conditions (including not performing procedures on dental patients identified to them as suspect or confirmed ATD cases) and incorporate the following into their IIPP:

- The Injury and Illness Prevention Program includes a written procedure for screening patients for ATDs that is consistent with current guidelines issued by the Centers for Disease Control and Prevention (CDC) for infection control in dental settings, and this procedure is followed before performing any dental procedure on a patient to determine whether the patient may present an ATD exposure risk.
- Employees have been trained in the screening procedure in accordance with section 3203.

Medical specialty practices are also exempt from section 5199 if they meet certain conditions (including not performing aerosol-generating procedures on patients identified to them as suspect or confirmed ATD cases) and incorporate the following into their IIPP:

- The Injury and Illness Prevention Program includes written screening procedures to identify potential ATD cases, and then refer those patients for further evaluation to an appropriate medical provider.
- Employees have been trained in the screening procedure in accordance with Section 3203.

Sources of Information & Help

A surprising amount of assistance can be obtained at no cost to you, if you take time to inquire. In cases where money must be spent, it is usually money well spent.

Cal/OSHA Consultation Service

Employers who need help developing, improving or maintaining a safe and healthy place of employment can obtain free professional assistance from the Cal/ OSHA Consultation Service on any of the issues or activities described in this manual. Cal/OSHA consultants help employers by:

- Identifying actual and potential safety or health hazards in the workplace and finding solutions to eliminate or control them.
- Identifying sources of help for employers if further technical assistance is needed.
- Providing a written report summarizing the finding of any consultation visit.
- Interpreting applicable safety and health standards.
- Helping establish or improve worksite IPPs.
- Helping develop and/or conduct safety and health training of both supervisory and nonsupervisory personnel.

To obtain assistance or information from the Cal/OSHA Consultation Service contact any of its offices listed on the back cover of this manual.

Other Sources

- It is likely that businesses similar to yours have encountered similar problems. It is also possible that at least one of them has found a simple, efficient solution. Most managers are willing to share information in the area of workplace safety and health.
- Most equipment manufacturers have also become quite concerned with safety in the use of their products. To help their customers and potential customers, and to minimize their liability in the event of adverse legal action, they are more than willing to furnish advice and engineering information to enhance safe operation of their equipment.
- Many workers' compensation carriers, as well as liability and fire insurance companies, conduct periodic inspections and visits to evaluate safety and health hazards and give guidance and assistance in establishing and monitoring your IIPP. Contact your carrier to see what it has to offer.
- Many trade associations and employer groups emphasize safety and health matters to better serve their members. If you are not a member, find out if these groups are circulating their materials to non-members, as many do.
- If your employees are organized, coordinate with their unions for taking joint action to solve problems and correct hazards. Many trade unions have safety and health expertise they are willing to share.

- The National Safety Council has a broad range of information services available.
- The Hazard Evaluation System and Information Services (HESIS) offers California employers' and employees answers to questions about the health effects of chemical and physical agents in the workplace.
- Search websites for companies that specialize in items and services relating to safety and health and fire prevention. Most of them have extensive experience and knowledge in safety-related subjects and are willing to furnish you with information and advice.

Index of Weblinks

Cal/OSHA Publications: www.dir.ca.gov/dosh/PubOrder.asp

Injury and Illness Prevention Model Program for High Hazard Employers:
www.dir.ca.gov/dosh/dosh_publications/IIPP-Model-high-hazard.pdf

Injury and Illness Prevention Model Program for Non-High Hazard Employers:
www.dir.ca.gov/dosh/dosh_publications/IIPP-Model-nonhigh-hazard.pdf

Injury and Illness Prevention Model Program for Employers with Seasonal or Intermittent Workers:
www.dir.ca.gov/dosh/dosh_publications/IIPP-Model-intermittent.pdf

Model Workplace Violence Prevention Program:

Cal/OSHA Title 8 California Code of Regulations (T8CCR):

www.dir.ca.gov/samples/search/query.htm

Carcinogens—Article 110: www.dir.ca.gov/Title8/sb7g16a110.html

Construction IIPP—Section 1509: www.dir.ca.gov/Title8/1509.html

General Industry IIPP—Section 3203: www.dir.ca.gov/Title8/3203.html

Hazard Communication—Section 5194: www.dir.ca.gov/Title8/5194.html

Injury and Illness Record Keeping—Section 14300: www.dir.ca.gov/T8/ch7sb1.html

Personal Protective Equipment—Section 3380: www.dir.ca.gov/Title8/3380.html

Petroleum IIPP—Sections 6507, 6508, 6509, 6760, 6761, 6762: www.dir.ca.gov/Title8/sb14a3.html
and www.dir.ca.gov/Title8/sb15a3.html

Ship Building/Repairing/Breaking IIPP—Section 8350: www.dir.ca.gov/Title8/8350.html

Tunnel IIPP—Section 8406: www.dir.ca.gov/Title8/sb20a3.html

Workplace Violence—California Labor Code 6401.9 and T8CCR section 3342 for healthcare.

Appendix A: Model Policy Statements

“The Occupational Safety and Health Act of 1970, clearly states our common goal of safe and healthful working conditions to be the first consideration in operating this business.”

“Safety and health in our business must be part of every operation. Without question, it is every employee’s responsibility at all levels.”

“It is the intent of this company to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he/she knows is not safe or healthy. Your cooperation in detecting hazards and, in turn, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.”

“The personal safety and health of each employee of this company is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.”

“We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and their co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.”

“Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.”

“Our safety and health program will include:

- Providing mechanical and physical safeguards to the maximum extent possible.
- Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions and practices, and to comply fully with the safety and health standards for every job.
- Training all employees in good safety and health practices.

- Providing necessary personal protective equipment, and instructions for use and care.
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment.
- Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it will not happen again.
- Setting up a system to recognize employees for outstanding safety service or performance. This recognition system should not discourage employees from reporting accidents, injuries, or illnesses.”

“We recognize that the responsibilities for safety and health are shared:

- The employer accepts the responsibilities for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.
- Supervisors are responsible for developing proper attitude toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.
- Employees are responsible for wholehearted, genuine operation of all aspects of the safety and health program—including compliance with all rules and regulations and for continuously practicing safety while performing their duties.”

Appendix B: IIPP Checklist

- Does the written Injury and Illness Prevention Program contain the elements required by section 3203(a)?
- Are the person or persons with authority and responsibility for implementing the program identified?
- Is there a system for ensuring that employees comply with safe and healthy work practices (i.e., employee recognition, training and retraining programs, and/or disciplinary measures)?
- Is there a system that provides communication with affected employees on occupational safety and health matters (i.e., meetings, training programs, posting, written communications, a system of anonymous notification concerning hazards and/or health and safety committees)?
- Does the communication system include provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal?
- Is there a system for identifying and evaluating workplace hazards whenever new substances, processes, procedures, or equipment are introduced to the workplace and whenever the employer receives notification of a new or previously unrecognized hazard?
- Were workplace hazards identified when the program was first established?
- Are periodic inspections for safety and health hazards scheduled?
- Are records kept of inspections made to identify unsafe conditions and work practices, if required?
- Is there an accident and near-miss investigation procedure?
- Are unsafe or unhealthy conditions and work practices corrected expeditiously, with the most hazardous exposures given correction priority?
- Are employees protected from serious or imminent hazards until they are corrected?
- Have employees received training in general safe and healthy work practices?
- Do employees know the safety and health hazards specific to their job assignments?
- Is training provided for all employees when the training program is first established?
- Are training needs of employees evaluated whenever new substances, processes, procedures, or equipment are introduced to the workplace and whenever the employer receives notification of a new or previously unrecognized hazard?

Developing Your Workplace Injury & Illness Prevention Program

- Are supervisors knowledgeable of the safety and health hazards to which employees under their immediate direction and control may be exposed?
- Are employees informed of their rights and how to access a copy of the IIPP?
- Are records kept documenting safety and health training for each employee by name or other identifier, training dates, type(s) of training and training providers?
- Does the employer have a labor-management safety and health committee?
- Does the committee meet at least quarterly?
- Is a written record of safety committee meetings distributed to affected employees and maintained for Division review?
- Does the committee review results of the periodic, scheduled worksite inspections?
- Does the committee review accident and near-miss investigations and, where necessary, submit suggestions for prevention of future incidents?
- When determined necessary by the committee does it conduct its own inspections and investigations, to assist in remedial solutions?
- Does the committee verify abatement action taken by the employer as specified in Cal/OSHA citations upon request of Cal/OSHA?

Appendix C: Code of Safe Practices

(This is just a starting point. Amend and add to it to best reflect your workplace)

GENERAL

1. All persons shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the lead or supervisor.
2. Supervisors shall insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work and shall take such action as is necessary to obtain observance.
3. All employees shall be given frequent accident prevention instructions. Instructions shall be given at least every (provide the number of days suitable for your workplace).
4. Anyone known to be under the influence of drugs or intoxicating substances that impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
5. Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well being of the employees shall be prohibited.
6. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
7. No one shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
8. Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that is safe to enter.
9. Employees shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted, and to report deficiencies promptly to the foreman or superintendent.
10. Crowding or pushing when boarding or leaving any vehicle or other conveyance shall be prohibited.
11. Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their lead or supervisor.
12. All injuries shall be reported promptly to the supervisor so that arrangements can be made for medical or first aid treatment.
13. When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used.
14. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.



Cal/OSHA Consultation Programs

Toll-free Number: 1-800-963-9424

Internet: www.dir.ca.gov

On-site Assistance Program Area Offices



Voluntary Protection Program – Oakland, CA 94612 (510) 622-1081

This guide is available with active links at: www.dir.ca.gov/dosh/PubOrder.asp