

BACK TO BASICS – PUT THE POWER OF YOUR IIPP TO WORK

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It's time to take a fresh look at your District's Injury & Illness Prevention Program (IIPP). In 2020, employers were made keenly aware of the Cal/OSHA IIPP regulation CCR §3203, as it pertained to COVID-19 pandemic. Employers realized the IIPP regulation included a requirement to have procedures in place "when there is a new or previously unrecognized hazard present". The pandemic required employers to quickly figure out how to protect their employees from this new workplace exposure.

In this case Cal/OSHA provided guidance through the COVID-19 Prevention Temporary Emergency Regulation; however, this doesn't happen in all situations, so it's critical employers have a system in place to identify existing and new hazards. Good news! The "system" is already available. It's your IIPP.

There are eight elements of the IIPP. The power of the IIPP starts with the requirement for employers to conduct a hazard assessment to identify and evaluate workplace hazards. This process provides a road map to determine potential hazards, identify Cal/OSHA regulations, and develop workplace safety policies and procedures. Let's take a look at all of the elements of the IIPP. For guidance on developing or revising your specific program, go to Cal/OSHA's Guide to Developing Your IIPP. Please note, the information provided is general in nature, there may be exceptions outlined in the regulation that may pertain to your district.

RESPONSIBILITY

Employers typically agree that everyone has a responsibility to be safe; but to be successful, responsibilities and accountability go together. The IIPP Administrator must be given the authority to oversee and manage the IIPP; however, the true success happens when managers and supervisors understand how important their roles are and how their leadership is critical to an effective program. This leadership will influence employees and assist them with adhering to their safety responsibilities.

HAZARD ASSESSMENT

The hazard assessment is the heart of an effective IIPP. Gathering this information sets you up to develop and implement an effective IIPP. This process is critical when first developing your IIPP. It's also required when the following occurs:

- When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur; and
- Whenever workplace conditions warrant an inspection.

To continue to identify unsafe conditions, periodic inspections are also required to evaluate physical hazards, use of hazardous materials, and safe work practices.

COMPLIANCE

Here's where all your hazard assessment work comes into play. Cal/OSHA requires employers to have a system to ensure employees comply with safe and healthy work practices. Through your hazard assessment you have the information needed to determine other Cal/OSHA requirements, develop written programs, develop policies and procedures, and establish responsibilities and accountability.

Employers are required to have procedures in place to hold managers, supervisors, and employees accountable, but the key is having an ongoing accountability system to ensure the procedures are followed.

COMMUNICATION

Now that you've established the required policies and procedures it's time to think about how you communicate your district's commitment to safety and your expectations for employees. This is the time to think about the critical role of managers and supervisors and how they influence employees.

The regulation provides specific

requirements to include in your program. You must communicate safety in a readily understandable manner. You must encourage employees to inform you of identified hazards without fear of reprisal. Other recommended procedures include safety meetings, training programs, posting, written communications, anonymous hazard reporting options, and safety committees.

HAZARD CORRECTION

Your IIPP must include your commitment to correct unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard. This requirement falls hand-in-hand with the hazard assessment requirements. An unsafe condition can be identified through a variety of avenues, such as reported by an employee, through a hazard inspection, through an accident investigation, to name a few. The critical component is that the district have a system in place to document the hazard correction process.

ACCIDENT INVESTIGATION

Employers are required to include their procedures on investigating occupational injury and illnesses. This section can be used to educate employees on what to do in the event they are

injured as well as the investigative process. The goal of the investigation is to identify contributing factors and develop prevention measures to reduce reoccurrence.

TRAINING

All employees must be trained on general and job-specific hazards and safe work practices. Managers and supervisors must be trained on all health and safety hazards to which employees under their immediate direction and control are exposed.

In addition to hazard-specific safety training, training must be provided when:

- The IIPP is first established
- New employees are hired
- Employees are reassigned to a new area or task with no prior training
- New substances, operations, or equipment are introduced

Once the hazard assessment is completed the employer can use this information to determine the employee's training requirements based on the their exposures.

RECORDKEEPING

Documenting and recordkeeping is essential for an effective IIPP. Cal/OSHA requires that IIPP records be maintained for (1) year; however, employers can choose to maintain records longer.

Examples of records include:

- Safety training for each employee, including the employee's name, training dates, type of training, and training providers
- Inspections, including the person(s) conducting the inspection; the unsafe conditions and work practices identified; corrective action, and follow up
- Accident investigations
- Program revisions

Congratulations! Taking a fresh look at your IIPP is no easy feat, but the value is significant. When you address your workplace hazards it demonstrates your commitment to protecting your employees and it can have a positive impact on reducing the costs and risk associated with workplace injuries and illnesses. 🇺🇸

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