

## Manager/Supervisor Risk Management

#125– 2/7/13

A twice weekly e-mail training for YCPARMIA members

### TOPIC: SAFETY – INJURY AND ILLNESS PREVENTION PROGRAM (IIPP)

Since 1991 California employers have been required to create a comprehensive written safety plan called an Injury and Illness Prevention Program (IIPP). On a Cal/OSHA visit the IIPP is often the first document that the inspector will ask to see. Cal/OSHA requires that:

- The plan names the individual responsible for implementing and maintaining the IIPP. Common mistakes are to not update the plan when the responsible individual is changed, or to designate an individual with little or no management authority.
- There to be evidence of management's commitment. They want evidence that the plan is more than just a piece of paper by looking for documentation of management activity that promotes safety. Accountability and dedication of resources for safety issues is evidence of compliance.
- The IIPP establishes a system of communication. Cal/OSHA encourages the formation of a safety committee to fulfill this requirement. The IIPP is not a secret program. Employees must be able to share their concerns and solutions, while management has to show their actions in response.
- The IIPP include a system to document that employees comply with safe work practices. Records of employee recognition, training and discipline can be used to satisfy this requirement.
- The IIPP include procedures for identifying and evaluating workplace hazards. Regular workplace inspections, safety surveys, and assessments of the IIPP itself are all encouraged options.
- The IIPP create a written system for thoroughly investigating accidents and near misses that allow the employer to identify what caused them. The goal is to determine what caused the accident and then evidence appropriate corrective action – it is important not to slip into merely categorizing the accident as “preventable.”
- The IIPP create and maintain records that include hazard identification analysis, inspection records, written safe work practices, and employment training records.

It is essential to understand that the IIPP creates the standard against which the entity will be judged. Like any other policy, it establishes duties that must be fulfilled. The entity must be able to prove that it fulfilled its promises, or duties, with written documentation. Good intentions and oral reports carry no weight. Equally, excuses or reasons for postponing or dropping compliance with the IIPP are not accepted. The required standard is not “that we will do these things when nothing more important needs to be done.”

Next Topic: IIPP continued