



## Balance and Motion for Health

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### OSHA Requirements

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.

Cal/OSHA Injury & Illness Prevention Program

In California every employer is required by law (Labor Code Section) to provide a safe and healthful workplace for his/her employees. Title 8 (T8), of the California Code of Regulations (CCR), requires every California employer to have an effective Injury and Illness Prevention Program 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:

What is an Injury & Illness Prevention Program?

Your Injury and Illness Prevention Program must be a written plan that includes procedures and is put into practice. These elements are required:

- \* Management commitment/assignment of responsibilities;
- \* Safety communications system with employees;
- \* System for assuring employee compliance with safe work practices;
- \* Scheduled inspections/evaluation system;
- \* Accident investigation;
- \* Procedures for correcting unsafe/ unhealthy conditions;
- \* Safety and health training and instruction; and
- \* Recordkeeping and documentation.

Management Commitment/Assignment of Responsibilities

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 work-place

hazards and correct hazardous conditions or practices as they occur or are recognized.

You must commit yourself and your company by building an effective Injury and Illness Prevention Program 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 should include:

1. Establishment of workplace objectives for accident and illness prevention, like those you establish for other business functions such as sales or production for example: "Ten percent fewer injuries next year," "Reduce down-time due to poorly maintained equipment."

2. 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 safety record of the employees working under them, and then back it up with firm action.

3. A means for encouraging employees to report unsafe conditions with assurance that management will take action.

4. 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.
- \* Promoting and training employees in safety and health.

5. Setting a good example! If, for instance, you require hard hats to be worn in a specific area, then you and other management wear a hard hat in that area.

If you and your management team do not support and participate in the program, 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 program 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:

1. Meets regularly but not less than quarterly.
2. 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

the Division upon request.

3. Review results of the periodic scheduled worksite inspections.
4. Reviews investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness or exposure to hazardous substances, and where appropriate, submits suggestions to management for the prevention of future incidents.
5. 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.
6. Submits recommendations to assist in the evaluation of employee safety suggestions.
7. Upon request of the Division, verifies abatement action taken by the employer to abate citations issued by the Division.

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. You should request clarification from the Cal/OSHA Consultation Service.

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 tips on complying with this difficult section:

1. Your communication system must be in a form “readily understandable by all affected employees.” This means you should 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 him/her 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.

2. Schedule general employee meetings at which safety is freely and openly discussed by those present. Such, meetings should 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.

3. Training programs are excellent vehicles for communicating with employees.

4. 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.

5. 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.

6. A safety suggestion box can be used by employees, anonymously if desired, to communicate their concerns to management.

7. 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 program for the common good of all concerned. (Model policy, statements are found in Appendix A.)

8. Communicate your concerns about safety to all levels of management.

9. Document all communication efforts, as you will be required to demonstrate that a system of effective communication is in place.

## 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:

1. 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 should periodically review and update all rules and procedures to make sure they reflect present conditions.

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

2. Safe and healthful work practices developed for each specific job.

3. Discipline or reward procedures to help assure that safety rules and work procedures are put into practice and enforced. Reward or positive reinforcement procedures such as bonus, incentive or employee recognition programs should provide positive motivation for compliance with safety rules and procedures.

4. 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.

5. 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 Injury and Illness Prevention Program. It allows employees to learn their job properly, brings new ideas into the

workplace, reinforces existing ideas and practices, and puts your program 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 Injury and Illness Prevention Program includes training for both supervisors and employees. Training for both is required by Cal/OSHA safety orders.

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

1.

Let your supervisors know:

- \* They are key figures responsible for establishment and success of your Injury and Illness Prevention Program.

- \* 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.

2.

Let your employees know:

- \* The success of the company's Injury and Illness Prevention Program depends on their actions as well as yours.

- \* 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 Injury and Illness Prevention Program 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 he/she has received instructions on how to do it properly and safely, and is 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 program 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 assure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed.

### Getting Started on Your Injury & Illness Prevention Program

Put the elements (see page 7) of an Injury and Illness Prevention Program 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, call the Cal/OSHA Consultation Service for assistance. A Consultation Service consultant can help you determine what is needed to make your Injury and Illness Prevention Program effective. The consultant will work with you on a plan for making these improvements, and assist you in establishing procedures for making sure your program remains effective.

The following sections describe the process you might go through in establishing an

Injury and Illness Prevention Program. 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 program. 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 program. It could even be an engineer, personnel specialist or other staff member.

The person assigned must be identified by name in your program. Your program's success hinges on the individual you choose, and he/she 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 program, 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 report hazards in his/her immediate work area.

All employees must be informed of their responsibility under Labor Code Section 6407.1, which requires every employee to comply with occupational safety and health standards applicable to their own actions and conduct.

### 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 Injury and Illness Prevention Program. This information can help you identify workplace problems and determine what's involved in solving them.

Assessment of your workplace should be conducted by the person responsible for the Injury and Illness Prevention Program, and/or a professional occupational safety and health consultant.

It consists of the following activities.

#### Safety & Health Survey

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

This survey should evaluate workplace conditions with respect to: safety and health regulations and generally recognized safe work practices and physical hazards; use of any hazardous materials; employee work habits; and a discussion of safety and health problems with employees. The survey must be documented if made for the purpose of establishing an Injury and Illness Prevention Program.

Your safety and health survey includes:

1.

#### Equipment

- Make a list of your equipment and tools, including the principle locations of their use. Special attention should be given to inspection schedules, maintenance activities and your facility's layout.

2.

#### Chemicals

- Make a list of all chemicals used in your workplace, obtain material safety data sheets on the materials used, and identify where they are used.

3.

#### Work practices

- Detail specific work practices associated with equipment, tools and chemical use. Special attention should be given to personal protective equipment, guarding, ventilation, emergency procedures and use of appropriate tools.

4.

#### 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 Assessment

The next activity is an evaluation of your existing Injury and Illness Prevention Program to identify areas that may be working well and those that may need improvement.

Examine your company's:

1. Accident, injury or illness data.
2. Worker's compensation costs.
3. Rates of employee turnover or absenteeism.
4. Information on safety and health activities ongoing or previously tried.
5. Company policy statements.
6. Rules-both work and safety.
7. Guidelines for proper work practices and procedures.
8. Records of training programs.
9. Compliance with requirements of California's Right to Know Law and Hazards Communications Standard.
10. 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.  
11. 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 Injury and Illness Prevention Program: management commitment/assignment of responsibilities; safety communications system with employees; system for assuring employee compliance with safe work practices; scheduled inspections/evaluation system; accident investigation; procedures for correcting unsafe/unhealthy conditions; safety and health training and instruction; recordkeeping and documentation.

You may find that you are already well on your way toward having a good Injury and Illness Prevention Program. 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. One is an overall list of major changes or improvements needed to make your Injury and Illness Prevention Program effective. Assign each item a priority and a target date for completion, and identify the person who will monitor or direct each action.

The second part of an action plan involves 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, and when you plan to be finished. This part of the action plan helps you keep track of program 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 Injury and Illness Prevention Program 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 Injury and Illness Prevention Program. Remember, an

Injury and Illness Prevention Program is a plan put into practice.

## Maintain Your Program

Schedule a review-quarterly, semiannually or annually-to look at each critical component in your Injury and Illness Prevention Program, 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 program improvement.

## 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 as 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 program.

## 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 Title 8, 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 Internet at: [www.californiaosha.info](http://www.californiaosha.info) or [www.dir.ca.gov/DOSH](http://www.dir.ca.gov/DOSH)

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 work-place and pinpoint where immediate corrective action is needed.

Since the basic Cal/OSHA records are for reportable 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

Injury and illness records may not be the only records you need to maintain. 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 Title 8 of the California Code of Regulations 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 Injury and Illness Prevention Program. They must include:

1. 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, and 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.
2. Documentation of safety and health training required by standards for each employee. The documentation must specifically include employee name or other identifier, training dates, type(s) of training and 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 Injury and Illness Prevention Program may be limited to:

1. Written documentation of the identity of the person or persons with authority and responsibility for implementing the program;
2. Written documentation of scheduled periodic inspections to identify unsafe conditions and work practices; and
3. Written documentation of training and instruction.

Keeping such records fulfills your responsibilities under General Industry Safety Order 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.