



# New Year, Time For a Safety Program Checkup

by Chris Lee, WACA Safety Consultant

With 2017 underway, employers are advised to check two key elements of their safety programs: the Injury and Illness Prevention Program and the Heat Illness Prevention Program.

It's crucial to a business that the Injury and Illness Prevention Program and the Heat Illness Prevention Program are established, if they haven't already been created, and reviewed to ensure the programs adhere to applicable regulations.

## Injury and Illness Prevention Program (IIPP)

For over 20 years, Cal/OSHA has required employers to establish and maintain a written Injury and Illness Prevention Program (IIPP) specific to operations. For the construction industry, the IIPP applicable regulation is California Code of Regulations, Title 8, Section 1509.

Section 1509 requires the IIPP program to be consistent with General Industry Safety Orders at Title 8, Section 3203. Section 1509 further requires several more steps. First, the employer must adopt a code of safe practices that relates to the employer's operations. Second, the code must be posted at a conspicuous location at each job site office or be provided to each supervisory employee who shall have it readily available. Third, periodic meetings of supervisory employees shall be held under the direction of management for the discussion of safety problems and accidents that may have occurred. Lastly, supervisory employees shall conduct "toolbox" or "tailgate" safety meetings with their crews at least every 10 working days to emphasize safety.

The following eight elements should be addressed in the IIPP:

1. Responsibility
2. Compliance
3. Communication
4. Hazard assessment
5. Accident/exposure investigation
6. Hazard correction
7. Training and instruction
8. Recordkeeping

As in other program areas, Cal/OSHA has tools to assist employers in complying with regulatory requirements. To view Section 1509 online, visit [www.dir.ca.gov/title8/1509.html](http://www.dir.ca.gov/title8/1509.html).

## Section 1509 Contains the Following Useful Tools

- Pocket Guide for the Construction Industry
- Prevention Model Program for High Hazard Employers
- Workplace Postings
- Tailgate/Toolbox Topics: Setting up a Tailgate/Toolbox Safety Meeting

Members interested in checking their IIPPs for consistency with Cal/OSHA regulations can access the above link and click on "Prevention Model Program for High Hazard Employers." This model program was prepared for a wide range of employers to provide the essential framework required for a successful IIPP.

The model program requires the IIPP administrator to carefully review the requirements of all eight subject areas, complete the appropriate blank spaces and check items applicable to the business. Sample forms for hazard assessment and correction, accident/exposure investigation and worker training and instruction are provided.

## Heat Illness Prevention (HIP) Program

In 2005, California became the first state to adopt an emergency regulation to address the hazards of working in hot, outdoor environment-



*For the construction industry, the IIPP applicable regulation is California Code of Regulations, Title 8, Section 1509.*

California Code of Regulations, Title 8, Section 3395 applies to all outdoor places of employment with special high-heat procedures applying to the construction industry (as well as agriculture, landscaping, oil and gas extraction, and selected transportation activities delivering agricultural products and construction materials).

The critical elements of an effective HIP Program are:

- Procedures for providing sufficient water
- Procedures for providing access to shade
- High-heat procedures
- Emergency response procedures
- Acclimatization methods and procedures

## *California Code of Regulations, Title 8, Section 3395 applies to all outdoor places of employment with special high-heat procedures applying to the construction industry.*

As the regulation was amended effective May 2015, employers need to ensure their program is consistent with those changes. The following is a link to an electronic tool prepared by Cal/OSHA: [www.dir.ca.gov/dosh/etools/08-006/index.htm](http://www.dir.ca.gov/dosh/etools/08-006/index.htm). This tool contains the current version of Title 8, Section 3395 as well as "Employer Sample Procedures for Heat Illness Prevention."

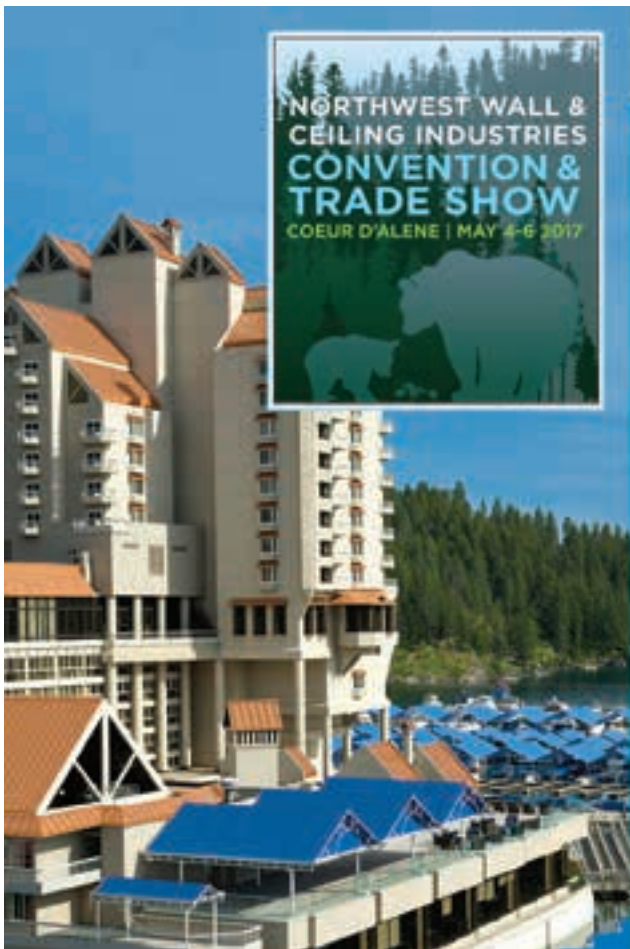
## Cal/OSHA Enforcement Procedures

It is important to remember that should a Cal/OSHA enforcement inspection occur, the compliance officer will undoubtedly provide a document request for, among other documents, the IIPP, safety inspection records, employee training records, safety committee meeting minutes and the HIP Program.

Should you receive this request, be certain to provide the documents by the postmark date noted on the top right-hand section of the request. If the copies are not provided by that date, Cal/OSHA will interpret this action as an admission that the documents do not exist. After this point, citations and penalties could result.

Affirming compliance with these two safety programs will help keep your business current with the regulations for your construction specialty.

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