

## IIPP: Written Elements

In the last column, I gave you an overview of the law regarding the OSHA Injury and Illness Prevention Program (IIPP) and its requirements. Starting with this column, we'll look at each of the requirements in detail.

We'll look first at the written elements, the most important of which is that your IIPP be in written form. That is, all of the details of your IIPP need to be explained on paper.

When preparing an IIPP, I like to be all-inclusive as I explain the various elements and an employer's intentions. There is a protective aspect to the way I write an IIPP for an employer. It is always the employer's intention that everything about the IIPP is for the welfare of the employee – even when responsibility is placed directly on the shoulder of the employee, such as when it is the intention of Bob's Super-Carbon Arrow Company that every employee receives training and instruction in the use of machine guards and that every employee must utilize such guards when operating any machinery or equipment.

In this example, the employer assumes the responsibility of training every employee in the proper use of safety equipment and mandates that every employee do so. If the employee fails to do so and then becomes injured as a result of his own negligence, it is not for a lack of training on your part, so you provide a layer of protection for yourself when that employee attempts to hold you responsible for his unsafe use of equipment.

Imagine that you did not have such a statement in your IIPP or in your training material. Imagine that you did not have any written requirement for employees to utilize machine and equipment guards. Now imagine the employee is suffering an injury and the civil jury is reviewing your IIPP, which has no mention of employees being trained in the safe use of equipment

nor required to use machine guards.

I encourage you to include enough detail in your written plan to avoid any ambiguity and to prevent any reader from being in doubt as to how a certain thing will be done, or what your intentions would be regarding any matter. My advice to employers is that you can never write too much!

Every endeavor benefits from a leader. It is no different when it comes to your company's safety program. That's good because the law requires that you identify the person that is responsible for the operation of your IIPP. This person is often the owner in a very small business with just a few employees.

Where there are 15 or 20 employees, an experienced manager is often named as the company's safety manager or, for large companies, a human resources specialist with specific workplace safety experience and training (usually an industrial hygienist) will administer the safety program. In any case, that person must be named in your written plan. I like to also appoint an assistant safety manager that can assume those duties when the safety manager is on vacation or otherwise becomes unavailable to fulfill those duties.

The person you appoint as your safety manager must be someone that is either educated or experienced in workplace safety, or someone that has tenure with your company so that he or she knows your operations well and could be considered well-versed in the potential safety hazards your employees would face. It is okay for you – the owner – to be the safety manager with no formal knowledge of workplace safety and no tenure in your own business but you really don't want to have a neophyte running your safety program.

No matter whom you appoint as safety manager, it is always the ultimate responsibility of the owner to ensure the safety program is effective

and operating according to the law.

For this very reason, you will work side-by-side with your appointed safety manager when putting together your IIPP. No matter how studiously you are regarding the IIPP regulations, it will become second nature to you when you actively participate in putting your program in place. If it ever becomes necessary for you – the owner – to explain your IIPP, you don't want to be fumbling around for answers. If you take a hands-off approach to your employee safety program, then you are really stuck if something happens to your safety manager and that person is no longer available to maintain your IIPP.

Next, you must describe how you will go about identifying and evaluating the potential health and safety hazards within your workplace. This always includes a review of the processes and procedures established for your employees, as well as a look at the equipment, tools and substances used by your employees. This is called your safety inspection and it is one of the most critical aspects of any safety program, yet it is much easier to fulfill this requirement than most people think.

During your initial inspection, you will go through your workplace with a fine-toothed comb to discover anything that presents a hazard to your employees. You will look at all tools, equipment and machinery to ensure they are in proper working order and that all safety equipment and safety guards are properly installed and operational.

Be sure to locate all operating and safety manuals that came with your tools and equipment. If you don't have them, you must get copies from the manufacturers or other sources, as they will become part of your training material and required documentation.

If it has been a while since you were intimately acquainted with any equipment or machinery in your workplace,

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**Bear's Traditional Side**

### Its Traditional Glory

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then I suggest you compare your equipment and machinery with the diagrams and written descriptions contained in your manuals. Sometimes it is not easy to tell if your equipment was originally fitted with any safety device; your manual may be the only sure method for deciding this question.

Another facet of your inspection is looking at your physical space and building. During this part of your inspection, you will be looking to see that there are no dangerous conditions inherent to your infrastructure, such as weak flooring, bad wiring, etc. You will also check the safety features of your workplace, such as adequate lighting for employees to do their jobs, properly lit exit signs, proper ventilation (especially in areas where hazardous substances are in use) and fully functioning fire extinguishers and fire-suppression systems.

The third facet of your physical inspection will be to identify every chemical based product in use in your workplace. This will include everything from your common consumer products, such as glass cleaners and scouring powders to specialty substances you use, such as solvents and raw chemicals.

You must acquire Material Safety Data Sheets (MSDS) for every product in your workplace. These MSDSs contain technical information explaining the hazards these products present to your employees.

The final aspect of your inspection will be to watch the way your employees do their jobs. You want to identify any dangerous habits they might have or their failure to properly use safety equipment.

We'll get into this a little deeper in my next column. Until then: here's to success and prosperity!



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