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|  | |  | | |  | **Instructions** | | |  |
|  | | |
| **Program Development Guide** |  | Welcome! It looks like you have just been assigned the task of developing and implementing your organization’s Injury and Illness Prevention Program (IIPP). In California, if you have 10 or more employees, you are required to have a written and effective IIPP in place, but it’s not just for Cal/OSHA compliance. Your IIPP communicates your commitment to a safe workplace; it says you care about your employees’ safety.  The following sample program is provided to assist you with the preparation and implementation of a truly effective IIPP. We have also developed a department IIPP supplement to help customize department operations.  Please note all eight sections included in the sample program are required by the regulation, [http://www.dir.ca.gov/title8/ 3203.html](http://www.dir.ca.gov/title8/%203203.html), and you will need to modify and customize several areas within the program. The information needed will be indicated by **BLUE TEXT.** We strongly recommend you complete a department IIPP supplement for each department to outline specific department processes and procedures.  We have also developed a Program Development Guide, located at the end of the sample program. The guide contains valuable information and pertinent Internet resources to assist you with customizing your program.  question.JPGThroughout the program you will see question mark icons. These are hyperlinks that take you to relevant information in the guide. There is also a “Back” button to return you to the program.  Once your program is customized, we recommend you copy the program material from this document, paste it into a new Word document, and remove the icons. | | | | | | |  |
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**Injury and Illness Prevention Program (IIPP)**

[](#Policy)

# Policy

We have established this written Injury and Illness Prevention Program (IIPP) in accordance with Title 8, California Code of Regulations, Section 3203, of the General Industry Safety Orders. All employees are required to comply with our safety and health policies and practices. This includes employees at every level and in all positions.

This IIPP includes the following elements:

* Responsibility and Authority
* Compliance
* Communication
* Hazard Assessment
* Accident Investigation
* Hazard Correction
* Training and Instruction
* Record Keeping

[](#Responsibility)

# Responsibility and Authority

**NAME OF PERSON/ OR JOB TITLE** is the designated IIPP Administrator and has the authority and responsibility for implementing and maintaining this IIPP.

Managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering employee questions about the IIPP. Employees are responsible for understanding and following the requirements of the IIPP and for asking questions when direction is unclear.

[](#Compliance)The department IIPP supplements provide department-specific information and additional direction. A copy of our IIPP is available from each manager and supervisor.

# Compliance

All employees, including managers and supervisors, are responsible for using safe work practices; following all directives, policies, and procedures; and assisting in maintaining a safe work environment.

The system to ensure all employees comply with these practices includes the following:

* Informing employees of the requirements within our IIPP in a readily understandable language
* Training all employees on general safety policies, rules, and work practices
* Recognizing employees who perform safe and healthful work practices
* Providing additional training to employees whose safety performance is deficient
* Disciplining employees for failure to comply with safe and healthful work practices

The department IIPP supplements outline department-specific compliance requirements.

[](#Communication)

# Communication

All managers and supervisors are responsible for communicating with all employees about occupational safety and health in a form readily understandable by all employees. Our communication system encourages all employees to inform their managers and supervisors about workplace hazards without fear of reprisal. Employees can report workplace hazards anonymously by **ENTER SPECIFIC INSTRUCTIONS**.

Our communication system includes:

* New employee orientation including a discussion of safety and health policies and procedures
* Review of our IIPP
* Safety training programs
* Regularly scheduled safety meetings
* Posted or distributed safety information
* A safety committee that includes employee participation from each department **(*Safety committees are optional. Remove this bullet if you do not plan to have a safety committee in place.*)**

Additional details are outlined in the department IIPP supplements.

**[](#HazardAssessment)**

**Hazard Assessment**

Periodic inspections will be conducted to evaluate physical hazards, use of hazardous materials, and safe work practices. The periodic inspection schedule and the responsibility for conducting the inspections are included in the department IIPP supplements.

In addition to the department periodic inspection schedule, inspections will be conducted as required in the following situations:

* When we initially established our IIPP;
* 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

**Hazard Correction**

When unsafe or unhealthy work conditions, practices, or procedures are observed or discovered, they will be corrected in a timely manner based on the severity of the hazards. When an imminent hazard exists that cannot be immediately corrected, the exposed employees will be removed from the immediate hazard except those needed to correct the condition and to address security issues. Employees who are required to correct the hazardous condition will be provided with the necessary protection.

**[](#AccidentInvestigation)**

**Accident/Incident Investigations**

Procedures for investigating workplace accidents and hazardous substance exposures include:

* Interviewing injured employees and witnesses;
* Examining the workplace for factors associated with the accident/exposure;
* Determining the cause of the accident/exposure;
* Taking corrective action to prevent the accident/exposure from reoccurring; and
* Recording the findings and actions taken.

Department-specific investigation and reporting procedures are located in the department IIPP supplements.

[](#Training)

**Training and Instruction**

All employees will participate in safety training on general and job-specific hazards and safe work practices. Each supervisor and manager will 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 will 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

Department-specific training procedures are located in the department IIPP supplements.

[](#RecordKeeping)

# Record Keeping

All the following IIPP documentation is maintained for three years:

* 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
* Accidents, illnesses, and near-miss inspections that identify the root cause and corrective action taken
* Safety committee meeting minutes ***(REMOVE IF YOU DO NOT PLAN TO HAVE A SAFETY COMMITTEE)***
* Annual program reviews

**NAME OF DEPARTMENT** IIPP Supplement

**Responsibilities**

The department manager has the overall authority and responsibility for ensuring the department IIPP supplement is effectively implemented throughout departmental operations. Supervisors have program oversight for operations under their direct supervision and control.

**Compliance**

The following department methods are used to reinforce employee compliance with safety work practices and procedures:

* Distribution of department policies and procedures
  + **ENTER THE NAME AND/OR LOCATION OF THE DEPARTMENT DOCUMENTS**
* Communicating IIPP responsibilities with all employees
* Employee training programs
* Recognizing employees who perform safe work practices
* Disciplinary process outlined in **Enter Name Of Document**.

**Communication**

Effective communications with employees have been established using the following methods:

|  |  |
| --- | --- |
| Department safety committee  Staff meetings every **00** days  Tailgate meetings every **00** days  Specific policies/procedures  Department hazard assessment  Employee safety training | Safety newsletter, handouts  Employee safety recognition  Material safety data sheets  Posters and warning labels  Other  **(LIST)** |

Employees are encouraged to report any potential health and safety hazard that may exist in the workplace. The Hazardous/Unsafe Condition Report form (see Attachment A) is located at **ENTER LOCATION.** Forms should be submitted to **ENTER NAME/TITLE.**

# Hazard Assessment and Correction

Periodic Workplace Inspections

Inspections are conducted at the following department facilities or workplaces:

|  |  |
| --- | --- |
| **Facilities and Workplaces** | **Frequency** |
|  |  |
|  |  |
|  |  |
|  |  |

Department inspection forms are located at **ENTER LOCATION.**

Corrective Action

Supervisors will document corrective actions, including projected and actual completion dates. If an imminent hazard exists, work in the area must cease, and the manager must be contacted immediately. If the hazard cannot be immediately corrected without endangering employees or property, all personnel need to leave the area except those qualified and necessary to correct the condition. **NAME INDIVIDUAL(S) DESIGNATED TO DETERMINE APPROPRIATE ACTION FOR IMMINENT HAZARDS**.

**Accident Investigation**

Employeeswill immediately notify their supervisor when an injury or illness occurs on the job. Supervisors will promptly investigate all accidents, injuries, occupational illnesses, and near-miss incidents to determine the cause of the incident. Appropriate corrective actions will be implemented promptly to mitigate the hazards identified during the investigation.

The Accident Report for Employees’ Compensation and the Supervisor’s Report of Injury form will be completed and a copy retained. The forms are located at **ENTER LOCATION**. **OUTLINE ADDITIONAL DEPARTMENT PROCEDURES, IF REQUIRED**.

**Note:** Serious occupational injuries and illnesses must be reported to Cal/OSHA within eight hours after they have become known to the supervisor. This includes, but is not limited to, permanent disfigurement or hospitalization. Cal/OSHA notification will be the responsibility of **NAME OF RESPONSIBLE DEPARTMENT/PERSON**.

**Training and Instruction**

Health and safety training, covering both general work practices and job-specific hazard training, is the responsibility of the supervisor and **ENTER NAME(S) OF OTHER INDIVIDUALS, IF APPLICABLE**.

General and department specific safety training requirements are located at **ENTER LOCATION OF TRAINING REQUIREMENTS/MATRIX.**

**Record Keeping and Documentation**

The following documents are located at **ENTER DEPARTMENT RECORDS LOCATION** and will be maintained within the **Department IIPP Records** for at least the three years.

* Department Hazard Assessment
* Employee Hazard Report Forms
* Inspection Reports
* Accident Investigation Forms
* Hazard Correction Reports
* Employee Safety Training Requirements and Attendance Records

**Attachment A**

**Hazardous/Unsafe Condition Report**

Person conducting inspection: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Area(s) inspected:

Were any unsafe conditions or work practices identified?  Yes  No

If yes, please describe:

What action(s) have been taken to correct the unsafe conditions or work practices identified?

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| **Program Development Guide** |  | Your commitment to safety and health shows in every decision you make and every action you take. Your employees will respond to that commitment.  It is not enough to simply say that you are doing training, inspections, and meetings. An effective IIPP describes your organization’s programs and policies as well as the way in which employees and managers carry them out.  The policy section needs to outline Cal/OSHA’s eight required elements, but it can also be a place where you can personalize your commitment, for example:  *To be successful, our program must embody proper attitudes toward injury and illness prevention on the part of managers, supervisors, and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between coworkers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved. All employees are required to comply with our safety and health policies and practices. This includes employees at every level and in all positions.*  [BACK button.JPG](#PolicyBack) | | | | | | |  |
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|  | |  | | |  | **Responsibility and Accountability** | | |  |
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| **Program Development Guide** |  | Your IIPP Administrator must be someone who has the authority to hold other departments and employees accountable for completing assigned safety responsibilities, preferably someone in management with a safety background.  The IIPP Administrator **is not** the person taking care of all your safety responsibilities. The IIPP Administrator acts as a facilitator, even as a “coach,” but the frontline real safety work is accomplished by department managers, supervisors, and employees.    [BACK button.JPG](#ResponsibilityBack) | | | | | | |  |
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| **Program Development Guide** |  | Developing written methods to reinforce safe work practices is the easy part. To actually implement those methods is extremely challenging. Let’s break this section down bullet by bullet.   * ***Inform employees of the requirements of the IIPP***   Employees need to know what is expected of them. If they have specific responsibilities, they need to know what they are, why they’re important, and what will happen if they don’t follow through on their responsibilities.   * ***Train employees on general safety policies, rules, and work practices***   Before you can train your employees on safety rules and work practices, you have to know what those safety rules and work practices should be.   1. Have you conducted a hazard assessment to evaluate workplace conditions with respect to safety regulations, safe work practices, physical hazards, and use of hazardous materials? 2. Based on the assessment results, have you developed written safety policies, rules, and work practices?   If the answer is no, then the Hazard Assessment Section of this guide will be very helpful when you conduct the assessment.  If you do have safety policies, rules, and work practices in place, make sure you have a system to track which employees have received appropriate training and instructions.   * ***Recognize employees who perform safe work practices***   Make sure managers and supervisors, as part of their job duties, have the time to observe employee work habits and provide feedback. Try simply having managers and supervisors recognize employees by thanking them for making an extra effort to work safely or coaching them when corrective action is required. Rewarding employees doesn’t need to be complicated, but it does need to be certain, positive, and genuine.  If you have a formal recognition program in place, make sure it is fair and consistently implemented.   * ***Additional training to employees whose safety performance is deficient***   Providing additional training is a good way to emphasis safe work practices and ensure the employee understands the safety rules. | | | | | | |  |
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| **Program Development Guide** |  | * ***Disciplining employees for failure to comply with safety policies, rules, and work practices***   Depending on your organization’s culture and the degree of non-compliance, disciplinary action may be the proper course of action. Communicate the importance of safety, and reinforce this message continually.  Ensure your actions match your words, because if they don’t, management credibility and your safety program will suffer.  Use a progressive disciplinary action system, such as first offense, verbal warning; second offense, written warning; third offense, suspension - time off without pay; fourth offense, termination.  In some instances, if the offense is serious enough, and if your policy permits, a properly documented suspension or termination could be the proper course of action. The specifics of your policy should be reviewed and discussed with your organization’s attorney.   |  | | --- | | Resources | | Sample Compliance Policy  <http://www.dir.ca.gov/DOSH/etools/09-031/Q6Example.pdf> | | Sample Employee Recognition Policy  <http://www.dir.ca.gov/DOSH/etools/09-031/Q4Example.pdf> | | Sample Disciplinary Action Policy  <http://www.dir.ca.gov/DOSH/etools/09-031/Q5Example.pdf> |   *[BACK button.JPG](#ComplianceBack)* | | | | | | |  |
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|  | |  | | |  | **Communication** | | |  |
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| **Program Development Guide** |  | Cal/OSHA wants to know you are actively and consistently communicating with employees about safety. But, communication isn’t just about the spoken word. The old saying “actions speak louder than words” couldn’t be more true when it comes to your safety program.  The Communication Section of the IIPP and the department supplement provide methods on how you can regularly communicate safety to your employees. These methods are taken directly from the Cal/OSHA “Guide to Developing Your Workplace IIPP.”  To help you develop an effective communication system, take a look at the Cal/OSHA Guide, which includes the following recommendations:   * Communication must be in a form “readily understandable by all affected employees.” * Encourage employees to report workplace hazards; it’s a two-way system. * Conduct regular and scheduled safety meetings. * Safety training is a form of communication. * Posters, bulletins, newsletters can be very effective ways of communicating. * While they are not required, safety committees are a great way to comply with your communication requirements.  |  | | --- | | Resources | | Cal/OSHA IIPP Guide  <http://www.dir.ca.gov/dosh/dosh_publications/iipp.html> | | Cal/OSHA Publications  <http://www.dir.ca.gov/dosh/PubOrder.asp> | | OSHA Publications  <http://www.osha.gov/pls/publications/publication.html> | | National Safety Council Publications  <http://www.nsc.org/products_training/Pages/Home.aspx> |   [BACK button.JPG](#CommunicationBack) | | | | | | |  |
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|  | |  | | |  | **Hazard Assessment & Correction** | | |  |
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| **Program Development Guide** |  | Periodic inspections provide an effective way to identify your existing or potential hazards; while correction procedures provide a way to eliminate and/or control them.  There are no specific Cal/OSHA requirements regarding inspection frequency. The frequency of inspections depends on the operations involved, the magnitude of the hazards, the proficiency of employees, changes in equipment or work processes, and the history of workplace injuries and illnesses.  A best practice would be to perform formal inspections of all buildings at least annually and of high-hazard facilities and operations at least quarterly. Sometimes you are required to conduct monthly inspections on emergency lighting, emergency showers, and fire extinguishers. And, there are conditions and operations where daily inspections are warranted. Cal/OSHA has a comprehensive hazard assessment checklist to help you identify and evaluate hazards in your workplace.  Hazards should be corrected as soon as they are identified. For any that can’t be immediately corrected, set a target date for correction based on considerations such as the probability and severity of an injury or illness resulting from the hazard; the availability of needed equipment, materials, and/or personnel; time for delivery, installation, modification, or construction; and training periods.  Provide interim protection to employees who need it while correction of hazards is proceeding.  **REMEMBER TO DOCUMENT, DOCUMENT, DOCUMENT**   |  | | --- | | Resources | | Cal/OSHA Hazard Assessment Checklist  <http://www.dir.ca.gov/DOSH/etools/09-031/HazAssessCheck.pdf> | | Cal/OSHA Corrective Action Form  <http://www.dir.ca.gov/DOSH/etools/09-031/IndHazCorRec.pdf> |   [BACK button.JPG](#HazardAssessmentBack) | | | | | | |  |
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|  | |  | | |  | **Accident Investigation** | | |  |
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| **Program Development Guide** |  | What’s the true purpose of investigating accidents? Is it to figure out what the employees did wrong so they can be disciplined? Is it to cover your bases just in case you get a visit from Cal/OSHA?  Not from our perspective. We believe the true purpose of investigating accidents is to look beyond the obvious and search for answers to prevent the same type of accident from happening again.  Investigations should be conducted by trained managers and supervisors. They should approach the investigation as a fact-finding mission. Employees should be treated with respect, resulting in employees willing feeling more at ease and willing to share the necessary information. | | | | | | |  |
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|  | |  | | |  | **Accident Investigation** | | |  |
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| **Program Development Guide** |  | An investigation should contain all the facts surrounding the occurrence, such as what caused the situation to occur, who was involved, was the employee qualified to perform the functions involved in the accident, was he or she properly trained, were proper operating procedures established for the task involved, and were procedures followed and if not, why not.  The Cal/OSHA “Guide to Developing Your Workplace IIPP” includes useful information to help you develop effective accident investigation techniques.   |  | | --- | | Resources | | Cal/OSHA IIPP Guide – Accident Investigation  <http://www.dir.ca.gov/dosh/dosh_publications/IIPP.html#9> | | California DIR – Division of Workers’ Compensation  (Employer and employee claims information)  <http://www.dir.ca.gov/DWC/> | | California DIR - DWC Forms  <http://www.dir.ca.gov/dwc/forms.html> |   [BACK button.JPG](#AccidentInvestigationBack) | | | | | | |  |
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|  | |  | | |  | **Training and Instruction** | | |  |
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| **Program Development Guide** |  | Employee safety training is one of the most important elements of your IIPP. The information you’ve gained while identifying your hazards and developing control procedures will help you develop work practices and training requirements.  To be effective and meet Cal/OSHA requirements supervisors need to know:   * They are key figures responsible for the success of your IIPP * 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 communicate this information to employees by setting good examples, instructing them, and making sure they fully understand and follow safe procedures * How to investigate accidents and take corrective and preventive action   Employees need to know:   * The success of the organization’s IIPP 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  |  | | --- | | Resources | | IIPP Guide - Safety & Health Training <http://www.dir.ca.gov/dosh/dosh_publications/IIPP.html#11> | | List of Training Subjects  <http://www.dir.ca.gov/DOSH/etools/09-031/TrainingSubjects.pdf> | | Training and Instruction Requirements  (Includes applicable regulations and available resources) <http://www.dir.ca.gov/dosh/dosh_publications/TrainingReq.htm> | | Code of Safe Practices (general)  <http://www.dir.ca.gov/dosh/dosh_publications/IIPP.html#31> | | | | | | | |  |
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| **Program Development Guide** |  | Once you’ve determined the training needs for each of your departments, we recommend developing a training matrix that identifies the type and frequency of the employee training. We also recommend developing a tracking mechanism to ensure all employees are actually receiving the training.  Here is a condensed example of a department safety training matrix:  Here is an example of tracking employee training by department:  [BACK button.JPG](#TrainingBack) | | | | | | |  |
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|  | |  | | |  | **Record Keeping** | | |  |
|  | | |
| **Program Development Guide** |  | This section almost speaks for itself…**DOCUMENT, DOCUMENT, DOCUMENT**  It’s important that you read the Cal/OSHA record-keeping requirements in their IIPP Guide <http://www.dir.ca.gov/dosh/dosh_publications/IIPP.html#21>.  If you get a visit from Cal/OSHA, they want to see documentation to make sure you are doing what you say you are doing (with respect to your IIPP). In addition, record keeping enables you to learn from past experience and make corrections for future operations. This is how you can determine if your IIPP is truly effective.  We know this is not an easy task. It takes a strong organizational commitment to develop, implement, and maintain an effective Injury and Illness Prevention Program.    [BACK button.JPG](#RecordKeepingBack) | | | | | | |  |
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