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Your Company Safety Program “Preparing for 2023”

Safety is paramount for any business, and it’s important to make sure that your safety program is up to date.

Keeping your safety program current is key to maintaining a safe working environment and avoiding costly fines and penalties.

Regularly reviewing and updating your safety program ensures that your organization is compliant with all applicable safety regulations.

This checklist provides a comprehensive overview of the steps you should take to ensure that your safety program is up-to-date and compliant with all applicable regulations.

With this checklist, you can ensure that your safety program is in good standing and that your organization is doing its due diligence to keep workers safe.

The “bullet items” listed next are all elements of your Injury and Illness Prevention Program (IIPP) that should be reviewed/revised and/or updated for compliance with Cal-OSHA Title 8, General Industry and Construction Safety Orders.

- **Injury and Illness Prevention Program (IIPP)**

Before updating your IIPP, it is important to review your existing safety policies and procedures to determine what, if anything, needs to be updated.

This exercise will allow you to identify any areas of your safety program that require updating.

Additionally, it will help you determine if any areas of your safety program need to be added or expanded.

Your current safety policies and procedures should reflect the applicable Cal-OSHA regulatory requirements found under Title 8, Construction Safety Orders.

Your safety policies and procedures should be specific and concise, outlining the responsibilities of all parties involved in the safety process (e.g., management, supervisors, and workers).

Your safety policies and procedures should also be easy for workers to understand. If your safety policies and procedures are too complicated, workers may be less likely to follow them.

Your IIPP must contain the following:

- Name/s of Responsible Person
 - A system to identify and prevent safety and health hazards.
 - Periodic scheduled inspections.
 - Investigation of injuries, illnesses, and accidents.
 - Hazard correction
 - Employee safety training.
 - communication with employees regarding safety and enforcement of safety rules.
 - Recordkeeping consistent with applicable requirements.
- **OSHA 300 Log: (When required, must be submitted electronically to OSHA)**

The submission requirements are set to include companies that meet either of the below two criteria:

- Establishments with more than 250 employees at any period of time within the prior year.
- Companies with more than 25 employees but less than 250 employees at any given time in the prior year, whose principal industry is listed as one of the specified NAICS codes.
- These companies must submit their OSHA 300 form by the required due date.

Which Companies Are Not Required to Report Electronically?

- Companies that have fewer than 250 employees or who have more than 25 employees but do not perform activities outlined in the list of NAICS codes do not need to report their OSHA 300A form electronically.
- These companies should keep the form posted so that employees or other concerned individuals may view it.

The OSHA 300A Annual Summary must be posted from Feb. 1 – April 30 for the previous year.

- **COVID-19 “Permanent Regulation Update” (To be approved by the Office of Administrative Law by Jan. 30, 2023)**

The permanent regulation provides that COVID-19 is a workplace hazard and shall be addressed as part of an employer’s required Injury and Illness Prevention Program (IIPP).

Employers can choose whether to incorporate their COVID-19 procedures in the written IIPP or maintain a separate document.

As many employers know, the most common Cal/OSHA citation is related to the IIPP, so you want to make sure you either update your IIPP or create an addendum that covers the COVID-19 procedures.

- **CPR/First Aid**

“The employer shall ensure that there are an adequate number of employees trained as first aid providers at each worksite during each work shift.”

- **Hazard Communication**

- The company must maintain Safety Data Sheets for all chemicals used onsite.
- Employees must be trained on the hazards of chemicals they work with.
- The employer must have a written Hazard Communication Program.

- **Worker Protection from Wildfire Smoke**

- The company must have a written Worker Exposure to Wildfire Smoke Program.
- The company must provide workers with N95 Respirators for their voluntary use when the Particulate Matter Index (PMI) is 151. When the PMI is 500 or above, the company must mandate the use of N95 Respirators.

- **Emergency Response Plan**

Your emergency response plans should be closely related to your current safety policies and procedures. If your safety policies and procedures have changed since your workers were last trained, you'll need to update their emergency response plans.

Additionally, your emergency response plans should be closely related to your current safety training programs.

Ideally, your emergency response plans should be clear and concise, outlining the actions that workers should take in response to specific emergency situations.

- **Respiratory Protection**

If the company provides employees with half-mask or full-face air-purifying respirators, they must have/do the following:

- A written Respiratory Protection Program
- Pulmonary Function Tests
- Selection of Respirators
- Annual Fit Testing
- Cartridge Change Out Schedule
- Training
- Proper Storage

- **Lockout/Tagout**

A Lockout/Tagout program must establish minimum requirements for the lockout/tagout of energy isolating devices.

It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources, and locked out before being re-energized or start-up of the machine or equipment or release of stored energy could cause injury.

Cal-OSHA requires:

- A written Lockout/Tagout Program
- Lockout/Tagout Procedures
- Training for Authorized or Affected Employees
- Lockout Surveys for all Equipment
- Annual Lockout Audits

- **Confined Spaces**

- The company must have a written Confined Space Entry Program

Training:

- What is a Confined Space
- Permit, Non-Permit and Alternate Entry Procedures
- Confined Space Hazards - Atmospheric and Physical
- Lockout/Tagout Procedures
- Duties of Entrant/Attendant/Entry Supervisor
- Confined Space Permits
- Atmospheric Monitoring Equipment
- Ventilation
- Personal Protective Equipment
- Rescue

- **Trenches/Excavations**

- The company must have a written Trench/Excavation Safety Program

Training for "Competent Person"

- Cal-OSHA Trench/Excavation Regulations
- Soil Classification
- Competent Person Responsibilities
- Hazards of Trenches/Excavations
- Protective Systems
- Daily Inspection Checklist

- **Fall Protection**

The company must have a written Fall Protection Program

“Competent Person” Training:

- Trigger Heights
- Work on Ladders, Scissor Lifts, Aerial Devices, Forklifts, Scaffolds, Guardrails, Skylights
- Fall Protection Systems (Fall Restraint/Fall Arrest)
- Equipment Inspections
- Fitting the Full-Body Harness
- Rescue

Fall protection equipment must be inspected twice annually by a “competent person” and the results documented.

- **Job Safety Analysis**

*Prior to the presence of its employees, **the employer shall make a thorough survey of the conditions of the site** to determine, so far as practicable, the predictable hazards to employees and the kind and extent of safeguards necessary to prosecute the work in a safe manner.*

- **Safety Meetings**

Title 8, California Code of Regulation Construction Safety Orders, Section:1509, requires safety meetings **at least every 10 working days**.

- **Jobsite Safety Audits**

California Code of Regulations, Title 8, § 3380 (f) (2) (2019) – There must be a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date (s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

- **Scissor Lifts/ Aerial Devices/ Hi-Reach Forklifts**

- All operators must be trained.

- **Heavy Equipment Operator Training Program**

- The company must have a written Heavy Equipment Operator Program.
- All operators must be trained.

Finally, before updating your safety program, it's important to examine your safety auditing procedures. This includes reviewing your current safety auditing procedures and determining if any changes need to be made.

Your safety auditing procedures should reflect the current state of your safety program and be sufficient enough to verify compliance with applicable regulations.

If your safety auditing procedures are inadequate, you may want to consider updating your safety auditing procedures to reflect the current state of your safety program.

Your safety auditing procedures should also be sufficient enough to provide Cal-OSHA with the information they need to verify your compliance.

If your safety auditing procedures are inadequate, you may be assessed fines and penalties by Cal-OSHA. In some cases, you may even be issued a citation.

This can be costly, not to mention damaging to your reputation as an employer.