

## Manager/Supervisor Risk Management

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A twice weekly e-mail training for YCPARMIA members

### TOPIC: SAFETY – IIPP – COMMUNICATIONS

Another required element in the IIPP deals with communication – top down and bottom up. Management has to be able to communicate to their employees on safety and health issues, and the employees have to have access to a system that encourages them to communicate the safety concerns to the employer. If everyone is responsible for safety there has to be a method to communicate.

The goal of the IIPP communication requirement is to get the employees concerns and suggestions to the person with the responsibility and authority for developing and maintaining a safe workplace. The system has to allow employees to communicate without fear of retaliation or reprisal. This is probably both an objective and a subjective standard. It is not enough that management states that the employees have nothing to fear; it is also necessary that they create an environment where the employees subjectively believe it. Note: YCPARMIA has a confidential “suggestion box” available online at our homepage that allows our member’s employees to anonymously report their concerns; upon receipt we pass the comments on to the member’s YCPARMIA Board member.

It is important to remember that the goal of the IIPP should not be to pass a Cal-OSHA inspection. Instead the goal of the program is create and maintain a safe work environment by, among other things, encouraging communication on safety issues. Having a required communications system does not make the worksite safe, rather it is a tool designed to help accomplish it. During an inspection, Cal-OSHA will require the employer to present their formal system with appropriate documentation that it is active and effective. Internal safety bulletins/newsletters, training programs, and regular tailgate meetings can all be part of the system. Regardless of the system, the underlying purpose must be evidenced: a two-way system “designed to encourage employees to inform the employer of hazards at the workplace without fear of reprisal.”

To beat a dead horse – it is two way communication. Management can obviously mandate safety top-down, but without buy-in by the workers it is less effective. The workers, who are arguably in the best position to identify safety concerns and solutions, are more likely to “buy-in” if management listens and responds to the workers’ issues. The IIPP requires that the employer have a formalized communication system that establishes and encourages this ongoing interchange.

An employee-management safety committee is not required by Cal-OSHA, but as an option it is encouraged. An employer who has a safety committee is presumed to be in substantial compliance with the communication element as long as it meets or exceeds certain criteria. Again, it is not enough to have a system or a committee; it has to actually meet, function, and document its activities and communications on an ongoing basis.

Next Topic: IIPP – Safety Committee