

## Manager/Supervisor Risk Management

#137– 3/26/13

A twice weekly e-mail training for YCPARMIA members

### TOPIC: SAFETY – SIZE VERSUS EXPOSURE

Under certain circumstances, Cal/OSHA has a different standard of action and documentation for smaller employers. Common sense suggests that it is not an indication that they are any less exposed to accidents or injuries, but rather that a smaller organization does not have the resources or staffing for developing and updating policies, training, and record keeping that a larger employer might have. The standard cut-off seems to be 10 or fewer, or 20 or fewer employees depending on the particular Cal/OSHA program.

A number of YCPARMIA members would fall into these categories. For those members it is important to understand that their size does not necessarily relieve them of the responsibility for required safety programs. Rather, Cal/OSHA allows them latitude in how they keep records, and communicate the programs to their employees. For example, Cal/OSHA does not require employers with ten or fewer employees to maintain a written Emergency Action Plan, but instead permits the employer's plan to be communicated orally to employees. The employer still has to have the Emergency Action Plan, and has to be able to share it with Cal/OSHA if requested.

YCPARMIA feels that it is a "Best Practice" for all of its members, regardless of size, to hold themselves to the Cal/OSHA standards applicable to employers of undetermined size. This practice requires a more formal overall approach to safety, and should result in a safer workplace. Additionally, the justification that a small employer lacks the safety resources and staffing to maintain effective programs is not applicable, as those services and resources are available at little or no cost through YCPARMIA. Lastly, if/when Cal/OSHA shows up requiring records and policies, the employer will be able to produce them, and show that they exceeded the State's safety requirements.

YCPARMIA therefore will continue to train all members to the same safety standards and requirements regardless of their size.

Next Topic: Safety – Heat Illness Protection