

DOCUMENT NUMBER: 601

SUBJECT: Communication

DATE ISSUED: 11/01/91

EFFECTIVE DATE: 11/01/91

LAST REVISED: 07/01/18

PURPOSE: To establish a system of two-way, employer-employee communication on occupational health and safety matters.

POLICY: Each Organization will establish a means for its management to communicate their method for ensuring compliance with safe work practices, to include disciplinary actions for non-adherence. Management must also communicate safe work practice rules and other information relating to occupational hazards in an understandable manner, and make every effort to encourage employees to inform management about workplace hazards, free from fear of reprisal or other discrimination.

OBJECTIVE: To communicate to every employee, information and guidance relating to Safety and Health issues that will result in a reduction of injuries and accidents, and to encourage employees to communicate upwards their safety concerns.

SCOPE: All Department/Agency/District and County employees.

REFERENCE: CCR Title 8, GISO, Section 3203.

I. **INTRODUCTION:** CCR Title 8 GISO Section 3203 has added substantial new requirements for employers in the area of employee communications. Each County organization must establish an employee communication program that incorporates the following components:

- A. Communication of safe work practice rules and other information on occupational hazards in an understandable manner (this requirement applies to both clarity and language if non-English speaking employees are in the workforce).
- B. An explanation of the organization's method for ensuring employee compliance with safe work practice rules. Organizations must communicate to their employees the method(s) they will use to enforce compliance with safe work practice rules. (Disciplinary actions for non-adherence, and incentives for recognition of compliance are methods recognized as effective by Cal/OSHA).
- C. Encouragement of employees to inform management about workplace hazards free from fear of reprisal or other discrimination.
- D. If an organization makes a reasonable effort to advise employees of the above components verbally or in writing, and can document the effort, the organization will be deemed to be in compliance.

II **IMPORTANT ELEMENTS AND ALTERNATIVES.** The following should be taken into consideration to establish an effective employee communication program:

- A. Communicating in an Understandable Manner.
 - 1. The Provision of the law to communicate safe work practice rules and other information on occupational hazards, in an understandable manner, is essential to workplace injury prevention. This means that organizations must develop clear and concise safe work practice rules. The Organization's communication of its safe work practice rules in a documented manner will go a long way towards satisfying the aspect of understandability.
 - 2. Organizations employing non-English speaking persons could encounter problems with communicating safety information in a manner clearly understandable to these employees. Although the Cal/OSHA standard does not require translation of all training and other safety information, the County as employer, is clearly under the obligation to ensure that safety information is understood. Consequently, the organization may want to translate selected safety information or have a bilingual employee assist in explaining this information to non-English speaking employees. Whichever method is chosen must be carefully documented in detail.
 - B. Methods for Ensuring Employee Compliance with Safe Work Practice Rules:
 - 1. Incentives for accident, injury, or an illness-free workplace over a set period, including, but not limited to, prizes, gift certificates, savings bonds, etc.
 - 2. Awards or other forms of recognition for a good safety record.
 - 3. Disciplinary action, including loss of incentives, warnings, formal reprimands, and demotion.
 - 4. Suspensions without pay, and termination in cases of repeated or particularly serious violations.
 - C. No Reprisals or Discrimination
 - 1. An effective Employer-Employee Communication Program must include employee input in terms of advising the employer of unsafe conditions and practices, unrecognized hazards and suggestions to improve workplace safety. Furthermore, for this "employee to employer communication" to work effectively, employees must have no fear of adverse consequences for providing information to the employer.
 - 2. State Law/Cal/OSHA standards incorporate anti-discrimination provisions that protect the employee as it applies to the employer's injury and illness prevention program and the employees' participation in it.
- III. MEDIUMS FOR EMPLOYER-EMPLOYEE COMMUNICATIONS: The Cal/OSHA standard specifically indicates several methods for employer-employee communications that are deemed to meet the standard.
- A. Meetings: Supervisors/Managers may hold monthly meetings to communicate safety and health information of their choosing.

III. MEDIUMS FOR EMPLOYER-EMPLOYEE COMMUNICATIONS: - continued

1. These meetings can be held by a section, branch, office, or facility within a County organization.
2. Safety and Health Communication meetings should be well documented. The name of the office/unit, date and location of the meeting, safety and health subject matter covered, name of the presenter, and attendance sheets, preferably with the signatures of all attendees must be maintained on file for three (3) years.

NOTE: If meetings are chosen as the primary method of communicating, they must be held at least monthly. For construction crews, garages and shops, tailgate meetings must be held every 10 days and must be documented.

- B. Training Programs: The initial general safety orientation required for all employees may include all of the required elements (paragraph 1,A, B, & C above) of employee communications and therefore satisfy the organization's communication obligation until such time as other Safety and Health information must be communicated.
- C. Written Communications: An excellent substitute medium available for communicating with employees when meetings won't work, due to the inability of getting employees together at the same time, is through the written word.
 1. Monthly dissemination of safety and health information in a three-ringed binder, identified as a Safety Read File allows information to be communicated without the attendant disruption of work flow that meetings usually cause.
 - a. the Safety Read File would contain an Index of Topics being covered for the month followed by the actual information. An employee list of names with a statement at the top stating "I have read and understand the information contained in the Safety Read File for the month of _____" would be maintained in the file. A space beside the list of names would be set aside for the employee's signature and date.
 - (1) the name of the Administrator of the Read File and his/her phone number MUST be listed to receive any questions any one MAY have regarding the information being disseminated. Upon being asked a question, the Administrator would have to find the answer and provide it to the caller. The County Safety Office could be called for assistance if needed.
 - b. Each employee would be required to read the information and sign and date next to their name in the file as having read the information.

III. MEDIUMS FOR EMPLOYER-EMPLOYEE COMMUNICATIONS: - continued

- c. Publication and dissemination of a sufficient number of Read Files to provide one for each Office Division or Facility would, of course, be required. Each File would be assigned a control number, and a system for tracking the file would have to be utilized to prevent it from being lost.
 - d. Archiving of one copy of the complete Safety Read File including signature sheet, each time it is published would be necessary to prove that the information was communicated by the Organization.
2. The use of letters to employees or paycheck enclosures can be used to communicate particularly important information in a manner that assures employee notification. Policy changes, new safe work practice rules or just about anything can be effectively communicated in this manner.
 3. Posting of bulletins or colorful posters on bulletin boards in conspicuous areas pertaining to Safety Topics of the Organization Safety Program is an effective reminder of key elements. However, it is extremely difficult to document that the message was received. Therefore, posters are not recommended as the sole means of employee communications.
- D. Employee Input and Anonymous Communications: Organizational communication programs must be two-way, that is to say that a means for employees to express concerns about safety matters, including a method for doing it anonymously must be available: two methods are already established within the County.
1. A telephone Hot Line has been dedicated specifically for the recording of anonymous communication of any safety concern by any County employee. This phone recording line is monitored by the County Safety Division and recordings will be acted upon by the Safety Staff. The Hot Line telephone number is (951) 955-5868.
 2. The Employee Hazard Reporting Program allows employees to communicate by filling out a blank Hazard Reporting Form, SOP Form No. 401 that will be pre-located in all department/agency/district facilities. Organizations will be responsible for maintaining an adequate supply of these forms at all times. Forms are available from the Human Resources, Safety Division.
 3. Employees may also communicate their safety concerns through their Supervisor or Departmental Safety Representative, who in most cases will be receptive to reports relating to safety, because of their inherent responsibility for safety.
 4. Organizations should frequently remind employees of their right to make safety inquiries and report information without fear of reprisal and encourage them to report information to supervisors, managers and safety officials.

III. MEDIUMS FOR EMPLOYER-EMPLOYEE COMMUNICATIONS: - continued

E. Safety Committees/Safety Advisory Groups—Countywide and/or Organizational.

1. The County Safety Committee meets monthly and reviews accidents, injuries, inspections, hazardous conditions, safety-training programs and changes to Cal/OSHA laws.
2. Organizations may set up their own committee or advisory group to augment and assist with their Injury and Illness Prevention Program.

Through the use of a combination of several alternatives set forth in this policy, and an honest good faith effort, County Organizations can successfully demonstrate that the employee communication requirement of the Cal/OSHA standard is satisfied.