

**GENERAL OCCUPATIONAL
HEALTH AND SAFETY PROGRAM**

**The Injury and Illness Prevention Program (IIPP)
for the University of Nebraska-Lincoln**

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UNL Environmental Health and Safety

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1 INTRODUCTION

The UNL Injury and Illness Prevention Plan (IIPP) is general in nature and provides a framework for identifying and mitigating hazards in UNL work areas, thereby creating the foundation for the occupational health and safety program for UNL employees. A complete and comprehensive safety and compliance plan is created by using the IIPP in conjunction with the EHS Virtual Manual (or equivalent), EHS Safe Operating Procedures (SOPs), other EHS safety plans developed for specific hazards (i.e., Respiratory Protection Plan, Lockout/Tagout Plan, etc.), and supervisor/workplace specific plans and/or procedures. The EHS Virtual Manual provides a simple tool for assembling all EHS plans and procedures applicable to a given work area.

Key elements of the IIPP include hazard identification and control, provisions for responding to imminent hazards, employee training, safety inspections, accident reporting and investigation, recordkeeping, and safety committees. These components are more fully described in Section 2 of this document.

1.1 Policy

The IIPP is required by State law and its implementation is mandated by Regents Policy 6.3.5, **General Policy for University Injury and Illness Prevention Program**. UNL embraces and adopts as its own the Regents Policy, which states in part:

The Board of Regents of the University of Nebraska recognizes its role of stewardship in protecting and conserving the human, property, and financial resources of the University. Each employee of the University must also recognize this commitment, and practice the highest degree of concern for the safety of fellow employees, students, patients, and the general public. It is the policy of the Board of Regents to promote safety at all times and to prevent occupational injury, illness, and financial loss to the institution.

The personal safety and health of each employee of the University of Nebraska is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such importance that high priority will be given to supporting and funding programs and/or projects that prevent occupational injury and illness. To the greatest degree possible, management will provide all equipment and instruction on safety practices required for personal safety and health, in keeping with applicable standards.

1.2 Authority

Authority and responsibility for development and implementation of the UNL IIPP is derived from:

- Nebraska Department of Labor, Title 230, Chapter 6 - Workplace Safety Consultation Program
- University of Nebraska Board of Regents' General Policy for University Injury and Illness Prevention Program, RP-6.3.5
- Applicable OSHA regulations, 29 CFR 1910

Copies of these documents are available from the EHS office.

2 PROGRAM ELEMENTS

The IIPP is structured to reflect common-practice safety models, and includes the following program elements.

- Identification and control of hazards, including the development of written programs and safe operating procedures (SOPs) to address specific health and safety concerns, as needed or required by regulation (Section 2.1).
- Vestment of employees with authority to stop operations posing an imminent danger and protecting employees from discharge and discrimination for making complaints (Section 2.2).
- Employee training (Section 2.3).
- Regular inspections to identify hazards and noncompliance with regulatory requirements (Section 2.4).
- Procedures for reporting, investigating, and documenting all work related injuries and illnesses to identify root causes and appropriate corrective actions (Section 2.5).
- Maintenance of appropriate records (Section 2.6).
- Operation of the Chancellor's University Safety Committee and other campus safety committees (Section 2.7).

2.1 Hazard Identification and Control

Many activities combine to result in effective hazard identification and control.

Identification of hazards generally results from one of the following:

- Designation of certain activities as particularly hazardous by regulatory authorities (Section 2.1.1). In this case, federal or state authorities generally promulgate a specific rule or standard. Examples include forklift operation, potential exposure to bloodborne pathogens, entry into confined spaces, etc.
- Review of specific work locations or tasks to identify hazards (Sections 2.1.2 and 2.1.3).

Hazard control is accomplished by establishment of safe operating procedures and/or specific plans that incorporate provisions for engineering and/or administrative controls and personal protective equipment (Section 2.1.1). Hazard control is also enhanced through other activities described later in this document, including:

- Immediate response to imminent hazards (Section 2.2)
- Employee training (Section 2.3)
- Regular inspections to assess efficacy of established controls and/or identification of new hazards (Section 2.4)

- Accident reporting and investigation (Section 2.5)
- Recordkeeping (Section 2.6)
- Safety committee oversight (Section 2.7)

2.1.1 Safety Plans and Procedures for Specific Hazards

Some work duties are specifically identified by federal safety standards as posing significant hazards to employees. EHS develops and implements institutional plans and safe operating procedures for ensuring compliance with specific safety standards. EHS plans and procedures are available from the EHS office or on the EHS web site. These plans and SOPs are an integral part of and compliment UNL's IIPP. In the absence of specific regulatory standards and/or guidance from EHS, departments or supervisors are required to develop operational safety procedures for particularly hazardous tasks performed by their employees. EHS is available, upon request, to provide assistance.

EHS has developed several tools to make it easier for supervisors and employees to find specific safety information that is applicable to their jobs. The Virtual Manual is a web-based tool that is designed to sort and assemble EHS safety information so that the resultant manual is tailored to a specific work location. The Virtual Manual is available on the EHS Webpage. Alternatively, supervisors can elect to develop their own safety and compliance manual/reference materials so long as the materials adhere to regulatory requirements and are effective in achieving compliance and accomplishing the goals of the IIPP.

2.1.2 Work Area Safety Assessments

Certain hazards, such as fire and tornadoes, are common to all work areas and employees. The UNL Emergency Planning and Preparedness web site (<http://emergency.unl.edu/index.shtml>) is the primary source of information regarding natural hazards and general emergencies (i.e., tornados, fires, bomb threats, etc). While UNL publishes general guidance and procedures to address such hazards, supervisors must supplement this general information with information that is unique to the work area (i.e., specific evacuation routes and shelter-in-place locations, locations of alarms and emergency equipment, etc.).

2.1.3 Job Safety Assessments and Medical Surveillance

In addition to general hazards applicable to all work locations, many specific hazards are associated with specialized work areas or tasks. Supervisors are responsible to identify unique job hazards and mitigation plans. Guidance is provided by EHS in the SOP, **Job Safety Assessments**. JSAs must be updated as new hazards are introduced.

In some cases, employee exposure monitoring and/or medical surveillance may be needed to fully determine the risk associated with a particular occupational hazard. EHS can provide more information and support upon request regarding exposure monitoring and medical surveillance. Certain hazards require medical surveillance and/or qualification (e.g., exposure to high noise, mandatory use of respirators, etc.). See EHS SOP, **Medical Surveillance Exams**.

2.2 Imminent Danger/Employee Complaints

Imminent dangers are those safety hazards that pose an immediate threat of personal injury, illness, death, and/or significant damage to University property. Employees recognizing an imminent danger have the authority and responsibility to take the following measures:

- Stop the operation (if under their immediate control).
- Notify affected employees.
- Report the danger to the immediate supervisor having jurisdiction over the area.
- Report the danger to EHS.

Employees also play a key role in identifying non-imminent hazards and are encouraged to report problems or concerns to their supervisors. If the concern is not addressed at that level, employees can take the matter to their safety committee, department head/chair, and/or EHS. An employee may not be discharged or discriminated against for making any verbal or written complaint to their supervisor, department head/chair, a UNL safety committee, EHS, or any governmental agency.

2.3 Training

Effective training lies at the heart of any successful safety and compliance program, including the UNL IIPP because it is a critical component of hazard control. Training is intended to inform employees of hazards and effective mitigation strategies. UNL's safety training program consists of the following general components:

- Initial general safety orientation/training.
- Initial job and/or work area specific training.
- Retraining whenever new substances, processes, or equipment are introduced into the workplace which may create new hazards for which an employee has not been previously trained; or when new hazards are identified.
- Refresher training, as mandated by specific regulations/safety plans.

EHS maintains training records for all participants in EHS sponsored training. Departments and/or supervisors must maintain records of work area or task-specific training and other training not delivered or organized by EHS.

2.3.1 Initial General Safety Orientation/Training

All employees must participate in initial general safety training. At a minimum, this training must include the following topics:

- UNL Injury and Illness Prevention Program
- Emergency Response and Fire Safety

Depending on the hazards to which the employee is exposed, initial training may also require:

- Universal Precautions for Bloodborne Pathogens
- Chemical Safety (for employees working with chemicals)
- Chemical Waste Management (for employees working with chemicals)

Participation in EHS Core Safety Training (instructor-led or web-based) meets the requirement. Other training forums are acceptable if they include all topics listed above and are equivalent to the training provided by EHS.

In addition to the above, employees assigned to certain tasks will require additional training, generally available through EHS. Examples include: respirator use, forklift operation, ionizing radiation, confined space entry, etc. Additional guidance is available on the EHS web page.

2.3.2 Initial Job and/or Work Area Specific Training and Retraining

In addition to the training provided by EHS, employees must be instructed by their supervisors on how to protect themselves from hazards specific to their job duties and work areas. These hazards are specifically identified as part of the hazard identification process described in section 2.1. Training must be completed upon initial assignment and whenever new hazards or changes in procedures are implemented. At a minimum, this training must include the following topics:

- Emergency equipment and notification devices (location and use).
- Special emergency response procedures, as appropriate.
- Designated evacuation and shelter-in-place locations.
- Safe use of assigned equipment.
- Safe handling of hazardous materials.
- Use of assigned personal protective equipment.
- Overview of applicable specific regulatory requirements, rules, policies, procedures, and guidelines.

2.3.3 Refresher Training

Refresher training is generally mandated by specific regulations that require development and implementation of specific safety plans or programs. Refresher training is appropriate at frequency specified by regulation. For example, annual refresher training is required for employees subject to the Bloodborne Pathogen Exposure Control Program. The Virtual Manual provides guidance on required refresher training. In addition to specified frequencies, refresher training is always appropriate when:

- New hazards are introduced.
- Procedure, process, or equipment changes render previous training incomplete or obsolete.
- Observation indicates that the employee has not retained the requisite skill or knowledge from previous training efforts.

2.4 Inspections

Routine safety inspections are essential for identifying unsafe conditions that could result in personal injury, illness, death, property damage, or non-compliance. Supervisors and EHS are responsible for performing regular workplace inspections.

Departments are also encouraged to conduct regular inspections. When an unsafe/non-compliant condition is identified, it must be corrected.

2.4.1 Department/Supervisor-initiated Inspections

Supervisors must perform and document routine evaluations of their operations for health and safety hazards and/or non-conformance with regulatory requirements. Inspection checklists are provided on the EHS web site to assist in this endeavor.

Hazards noted during the inspections must be corrected as soon as feasible. At a minimum, inspections must be conducted at a frequency that ensures expedient identification of potential hazards. Obviously, the frequency would account for introduction of new hazards (equipment, process changes, etc.), substantial changes in regulatory requirements, and when accident(s) or near-misses occur. Departments are encouraged to also conduct and document inspections. Unit safety committees often are a valuable resource for conducting department-wide safety inspections and providing a second view of deficiencies that may not be recognized by individual supervisors.

2.4.2 EHS Surveys and Audits

EHS performs work-area surveys on a routine basis. EHS evaluations are not a substitute for supervisor inspections required under Section 2.4.1. EHS will communicate the results of surveys with appropriate department officials. Supervisors must take action to correct hazards/regulatory non-conformances identified by EHS.

2.5 Accident Reporting and Investigation

All occupational injuries and illnesses must be reported and investigated as described in the following sections.

2.5.1 Accident Reporting

An employee involved in an accident must report the incident to their immediate supervisor as soon as feasible. Accidents involving the death or hospitalization of an employee must be reported to EHS immediately. Serious occupational injuries and illnesses, and exposures to hazardous materials, must be reported to EHS within 24 hours of the event. After hours, EHS can be contacted by calling the UNL Operator or the UNL Police Department.

Employees involved in an accident must complete a **State of Nebraska First Report of Alleged Occupational Injury or Illness** form, **Workers' Compensation Incident Report** form, and **Choice of Doctor** form. These forms must be submitted as soon as possible to the UNL Risk Management Office by fax at (402) 472-6803. If medical treatment is required, these forms will start the workers compensation process. See EHS SOP, **On-The-Job Injuries**, for more information.

2.5.2 Accident Investigation

Supervisors must promptly investigate all accidents and take immediate action to correct problems identified. EHS will also investigate accidents and prepare a written summary of findings and recommended corrective actions. Supervisors are required to address corrective actions as specified in the EHS Follow-Up Report.

EHS maintains accident/incident investigation reports and will provide a quarterly summary of accidents/incidents to the Chancellor's University Safety Committee.

2.5.3 Early Return to Work Program

Supervisors of injured employees are strongly encouraged to participate in the Early Return to Work Program administered by the UNL Risk Management Office. Under this program, injured employees are placed on light-duty assignment, or are given other work that they are physically able to complete until such time as they are able to resume their normal duties. For more information, contact the UNL Risk Management Office.

2.6 Recordkeeping

Certain records must be maintained including JSAs, inspection reports, exposure reports, medical surveillance reports, training documentation, accident reports, summaries of investigations, and other records as required by supplemental specific safety or regulatory compliance plans. Departments are required to maintain those records that they generate. EHS will maintain records generated through the activities of their office.

Copies of employee exposure records must be retained for 30 years following the exposure. Medical records relating to an exposure shall be retained for 30 years after the employee separates from UNL. Medical records are maintained by the attending occupational physician. All other records shall be retained for at least five (5) years, unless otherwise required by a specific standard or regulation to be maintained for a longer period of time.

2.7 Safety Committees

Various safety committees are active at UNL to promote injury and illness prevention. The Chancellor's University Safety Committee operates at a campus-wide level. Other committees serve a specific department or function.

2.7.1 Chancellor's University Safety Committee (CUSC)

The Chancellor's University Safety Committee (CUSC) was established to assist the Chancellor by making recommendations on methods to reduce safety and health hazards at UNL. The CUSC is composed of representatives appointed by the Vice Chancellor for Business and Finance (VCBF).

All employees are eligible to serve as members of the Committee and can submit their name to EHS to be forwarded to the VCBF for consideration as a committee member. The Committee meets at least quarterly and maintains written minutes of its meetings.

Reports of injuries and illnesses and safety inspection reports may be reviewed by the CUSC. The CUSC may make recommendations on accident prevention. CUSC committee information, including meeting announcements and minutes of previous meetings, is available on the EHS Web Site.

2.7.2 Unit Safety Committees

Department safety committees exist in many units to assist the department head/chair with implementing and administering an effective safety and compliance program. At the discretion of the department head/chair, unit safety committee activities may include preparing unit safety plans, organizing safety training, conducting inspections, reviewing department injuries/illnesses, and addressing department-specific safety/compliance concerns. EHS provides various tools to unit safety committees to assist with accomplishing their missions.

2.7.3 Other Safety Committees

In addition, some UNL committees operate to address specific regulatory requirements or safety concerns. Some of these committees are listed below:

- Institutional Review Board – reviews all protocols involving human subjects.
- Institutional Animal Care and Use Committee (IACUC) - reviews use of live vertebrate animals.
- Radiation Safety Committee - reviews projects involving ionizing radiation (radioactive materials and radiation producing devices).
- Institutional Biosafety Committee (IBC) - reviews projects involving recombinant DNA and human, animal, or plant pathogens.

3 Responsibilities

Ultimate responsibility for establishing and maintaining effective health and safety policies, including the IIPP, rests with the Chancellor. Program development and resource allocation are administered through the Vice Chancellor for Business and Finance.

3.1 Vice Chancellors

Vice Chancellors are responsible to support and ensure the effective implementation of the IIPP within their reporting unit. They are responsible for providing resources adequate to support safety programs.

3.2 Deans/Directors/Department Heads and Chairs

Deans, Directors, and Department Heads and Chairs are responsible for promoting a positive attitude toward safety and compliance practices, identifying budget requirements, and developing departmental safety programs consistent with the requirements of UNL's IIPP. In addition, they are responsible for establishing an effective records maintenance system, as discussed in Section 2.6.

3.3 Supervisors

Supervisors are responsible to:

- Encourage a positive attitude about job safety and compliance in their employees.
- Identify hazards through job safety assessments and routine inspections, and take action to control identified hazards.
- Develop work area specific safety procedures as needed and provide written general and specific information to employees.
- Know and implement safe-work practices.
- Require employees to comply with applicable rules, policies, procedures, and guidelines.
- Provide and enforce the use and maintenance of safety devices and personal protective equipment as needed.
- Provide or arrange for effective general and job-specific safety training for employees at the required frequencies
- Ensure that employees report work-related injuries and illnesses and complete/submit applicable forms. Respond to recommendations for corrective actions proposed by EHS as a result of an inspection or accident investigation. Maintain communication with injured and/or ill employees and initiate efforts to return employees to productive employment as quickly as possible. Take action to prevent reoccurrence.
- Maintain records as required by the IIPP, supplemental safety plan or procedure, or department policy/procedure.

3.4 Employees

Employees are responsible to:

- Comply with all rules, policies, procedures, and guidelines applicable to their jobs, actions and conduct.
- Take every reasonable precaution to protect the health, life, and safety of themselves and other employees and facilities.
- Not remove, displace, damage, destroy, or carry off any safety device, notice, or warning furnished for use in any place of employment or interfere in any way with the use of it by any other person.
- Know and implement safety and compliance requirements of their work assignment.
- Use and maintain the protective equipment that has been provided and assigned for use.
- Report safety related problems or concerns to supervisor, department chair and/or EHS.
- Attend training sessions.
- Only perform tasks for which they are adequately trained.
- Report work-related injuries and illnesses promptly to their immediate supervisor, complete/submit applicable forms and cooperate with University efforts to provide timely workers' compensation information.

3.5 Environmental Health and Safety

Environmental Health and Safety (EHS) is assigned by the Chancellor to manage the development, implementation, and ongoing administration of the IIPP. EHS is responsible for the following actions:

- Develop and maintain the UNL Injury and Illness Prevention Plan (IIPP) and supplemental plans and procedures.
- Maintain records as required by the IIPP or supplemental plans or procedures.
- Assist campus administrators and department safety committees in their management of the IIPP.
- Provide consultation to UNL community on matters of workplace safety and compliance, including guidance for controlling workplace hazards and interpretation of applicable standards or regulations.
- Monitor worksite environments to determine and assess hazards.
- Develop and conduct campus-wide safety training.
- Provide technical support to campus safety committees.
- Investigate occupational injuries and illnesses and prepare summaries of accident information for the CUSC.
- Work with UNL Human Resources to support the occupational health, workers compensation, and early-return-to-work programs.