

# **Injury and Illness Prevention Plan (IIPP)**

## **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 complete occupational safety program for UNL employees.

## 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.

# 2 PROGRAM ELEMENTS

The IIPP is comprised of the following program elements.

- General workplace safety rules (Section 2.1).
- Compliance with federal Occupational Safety and Health Administration (OSHA) standards (Section 2.2).
- Emergency Preparedness Plans and Procedures (Section 2.3).

- Vestment of employees with authority to stop operations posing an imminent danger and protecting employees from discharge and discrimination for making complaints (Section 2.4).
- Employee training (Section 2.5).
- Regular inspections to identify hazards and noncompliance with regulatory requirements (Section 2.6).
- Procedures for reporting, investigating, and documenting all work related injuries and illnesses to identify root causes and appropriate corrective actions (Section 2.7).
- Operation of the Chancellor's University Safety Committee and other campus safety committees (Section 2.8).

## 2.1 General Workplace Safety Rules

Following are general workplace safety rules that apply to all UNL employees.

- No employee is authorized to conduct any task that he or she knows is not safe or healthful without implementing the appropriate controls to minimize hazards.
- No employee will be reprimanded or discriminated against for reporting unsafe conditions or acts.
- All employees are encouraged to share their observations and ideas for enhancing workplace safety with their supervisor, unit safety committee, EHS, and the Chancellor's University Safety Committee.
- All employees share responsibility for maintaining a safe work environment. All potential hazards that are beyond an employee's authority or expertise to correct or fully evaluate are to be promptly reported to a supervisor or other authority.
- Every employee is expected to adhere to all applicable safety procedures and requirements contained in this Plan and other safety/compliance plans developed in response to specific regulatory requirements.
- Supervisors are expected to continually monitor employee safety performance and take action to ensure that employees act in a safe and compliant manner. Supervisors are expected to serve as role models in this regard.
- Every employee shall ensure that they are familiar with emergency procedures, including designated evacuation routes, alarms, and designated shelter-in-place locations.
- Horseplay is prohibited.
- Employees are prohibited from working while under the influence of alcohol and/or drugs.
- Employees are encouraged to discuss with their supervisors personal conditions/situations that may adversely impact their ability to work in a safe manner (e.g., stress, fatigue, illness, etc.).
- Appropriate Personal Protective Equipment shall be worn at all times when conditions warrant and in specific designated locations.
- All employees must observe good housekeeping practices. This includes ensuring that stairwells, exit routes, exit doors, and access to electrical panels are free of obstruction. It also includes ensuring that spills, accumulated liquids, or other

conditions (curled mats, cords across walkways, etc.) that present a slip or trip hazard are promptly mitigated; and that the excess paper, cardboard, and other combustible materials are eliminated.

- Furnishings must be in good condition. Chairs, file cabinets, shelving, and other items that are not in good condition must be removed from service.
- Machine guards and other protective devices (such as interlocks) must be maintained in proper position and working order. Machines or equipment with defective or missing guards or interlocks must be promptly removed from service.
- Employees shall refrain from moving heavy objects unless specifically trained in proper techniques and authorized to conduct such tasks. Appropriate mechanical devices shall be used when such use will greatly minimize the risk of injury.
- Employees shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties.
- Employees must promptly report all occupational injuries/illnesses. Employees are encouraged to report “near misses” to their supervisor so that appropriate action can be taken to abate hazards before an injury occurs.
- The appropriate and proper tool or equipment shall be used when appropriate. Using a tool or equipment in a manner other than intended is prohibited. Tools and equipment that are not in good condition must be promptly removed from service.
- Extension cords are to be used only for temporary applications, and only when in good condition and equipped with a ground prong.
- Ladders must be used in accordance with manufacturer’s recommendations and limitations.

## 2.2 Compliance with OSHA Standards

UNL is committed to substantial compliance with applicable OSHA safety standards. EHS is charged with responsibility for developing institutional plans and procedures for ensuring compliance with specific OSHA standards. All affected members of the campus community are charged with responsibility for implementing and adhering to EHS plans and procedures.

In the absence of specific regulatory standards and/or guidance from EHS, departments or supervisors are required to develop operational safety procedures for hazards that may result in serious employee injury. EHS is available, upon request, to provide assistance. Such hazards can be identified through a Job Safety Assessment (JSA). Guidance on conducting a JSA is provided in the EHS SOP, **Job Safety Assessments**.

## 2.3 Emergency Preparedness Plans and Procedures

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/>) is the primary source of information regarding natural and man-made emergencies (i.e., tornados, fires, bomb threats, etc). While UNL publishes general guidance and procedures to address such hazards, supervisors must instruct

employees on information that is unique to their work area (i.e., specific evacuation routes and shelter-in-place locations, locations of alarms and emergency equipment, etc.). All employees are encouraged to subscribe to UNL Alert which will provide information regarding emergency situations via email, phone, and text messaging for those who are registered.

## **2.4 Imminent Danger/Employee Complaints**

Imminent dangers are those safety hazards that pose an immediate threat of serious 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.

## **2.5 Training**

Effective training 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 or re-training, as mandated by specific regulations/safety plans.

### **2.5.1 Initial General Safety Orientation/Training**

All employees must complete initial EHS general safety training. At a minimum, this training must include the following modules, which are available in a web-based or instructor-led format:

- UNL Injury and Illness Prevention Plan
- Emergency Preparedness

Employees who work with chemicals must also complete EHS **Chemical Safety** training, which is available in a web-based or instructor-led format. Employees assigned to certain tasks will require additional training, generally available through EHS. Examples include: bloodborne pathogens, respirator use, powered industrial

truck operation, ionizing radiation, confined space awareness, asbestos awareness, etc. The EHS **Employee Training Needs Assessment** (available on the EHS web page) is a tool that can be used to identify specific training required for individual employees based on their assigned tasks/responsibilities. As a supplement to the training described above, supervisors are encouraged to create an EHS Virtual Manual and to make the manual readily accessible to all employees.

### **2.5.2 Initial Job and/or Work Area Specific Training and Retraining**

In addition to the training provided by EHS, supervisors must provide certain work area specific information to their employees. At a minimum, this information must include the following:

- Emergency equipment and notification devices (location and use).
- Special emergency response procedures, as appropriate.
- Designated evacuation and shelter-in-place locations.
- Use and care of assigned equipment, tools, and engineering controls.
- Use and care of assigned personal protective equipment.
- Hazard control strategies and techniques that are unique to the work place or assigned tasks.

### **2.5.3 Refresher or Re-Training**

Frequency of refresher or re-training is generally mandated by specific regulations. For example, annual refresher training is required for employees subject to the Bloodborne Pathogen Exposure Control Program. 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.

## **2.6 Inspections**

Routine safety inspections are essential for identifying unsafe conditions that could result in serious personal injury, illness, death, or property damage. 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 promptly corrected.

### **2.6.1 Department/Supervisor-initiated Inspections**

Supervisors must perform routine evaluations of their operations for safety hazards and/or non-conformance with regulatory requirements. Inspections must be conducted at a frequency that ensures expedient identification of potential hazards. Inspection checklists are provided on the EHS web site to assist in this endeavor.

Departments are also encouraged to conduct 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.

### **2.6.2 EHS Inspections and Audits**

EHS performs work-area inspections on a routine basis. EHS evaluations are not a substitute for supervisor inspections. Supervisors must take action to correct hazards/regulatory non-conformances identified by EHS.

## **2.7 Occupational Injury/Illness Reporting and Investigation**

### **2.7.1 Occupational Injury/Illness Reporting**

An employee experiencing an occupational injury/illness must report the incident to their immediate supervisor as soon as feasible. Occupational incidents involving the death or hospitalization of an employee must be reported to EHS immediately.

Employees involved in an accident must complete a **Workers' Compensation Incident Report** form and **Choice of Doctor** form. Supervisors must complete a **State of Nebraska First Report of Alleged Occupational Injury or Illness** 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.

### **2.7.2 Occupational Injury/Illness Investigation**

EHS will investigate all occupational injuries/illnesses and prepare a written summary of findings and recommended corrective actions, as appropriate. EHS maintains accident/incident investigation reports and provides a quarterly summary to the Chancellor's University Safety Committee.

## **2.8 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.

### **2.8.1 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 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 prevention of occupational injuries/illnesses. CUSC committee information, including names of committee members, meeting announcements, and minutes of previous meetings, is available on the EHS Web Site. See EHS SOP, **Chancellor's University Safety Committee**.

### **2.8.2 Unit Safety Committees**

Department safety committees exist in many units. 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.

### **2.8.3 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 implementing safety programs within their reporting units.

### **3.3 Supervisors**

Supervisors are responsible to:

- Encourage a positive attitude about job safety and compliance in their employees and serve as a role model in this regard.

- 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.
- 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 well as adherence to safety practices, procedures, and rules.
- Ensure that employees complete applicable safety training at the required frequencies
- Ensure that employees report work-related injuries and illnesses and complete/submit applicable forms. As applicable, implement changes to prevent reoccurrence.

### **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, 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.
- Complete applicable safety training at the required frequency.
- Only perform tasks for which they are adequately trained.
- Report work-related injuries and illnesses promptly to their immediate supervisor and complete/submit applicable forms.

### **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.
- 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.
- Investigate occupational injuries and illnesses and prepare summaries of accident information for the CUSC. Maintain associated documentation.