UNIVERSITY OF WEST FLORIDA
Occupational Health and Safety Standards
POLICY AND PROCEDURES MANUAL

DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY

Purpose: **To comply with the University President's Policy ES-02.01 – 06/01 regarding Environmental Health and Safety Adopted Standards.**

The University of West Florida recognizes that workers' compensation costs are a function of the number of employee injury incidents and the severity of those incidents. Reducing the number and severity of injuries requires that preventive measures be initiated, evaluated, and appropriately revised to maximize their effectiveness. This Department of Environmental Health and Safety Policy and Procedures manual establishes preventive measures that are based on recognized health and safety standards. Compliance with these standards has been shown to prevent occupational-related injuries.

The University of West Florida
Environmental Health and Safety Department Policy and Procedures

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The University of West Florida

Environmental Health and Safety Program

Policy and Procedures Manual

Purpose: The University of West Florida is committed to a learning and employment environment where faculty, staff and students are protected from the risk of injuries as a result of being exposed to health and safety hazards. The purpose of this Environmental Health and Safety Program is to help prevent accidents and injuries, increase safety awareness, meet requirements of environmental and occupational health and safety laws and regulations, reduce institutional liability, and establish safety responsibilities for members of the university community and visitors to university-owned property.

Program Elements

Management Leadership and Employee Participation – 1.

1. The **University President** has ultimate responsibility for establishing and maintaining environmental health and safety programs for the university.

2. All **vice-presidents, deans and department heads** are responsible for:
   (a) Providing facilities and equipment required for a safe work environment.
   (b) Ensuring individuals under their management have the authority and support to implement health and safety policies, practices and programs.
   (c) Ensuring areas under their management are in compliance with university health and safety policies, practices and programs.
   (d) Establishing priorities and committing resources for correction of safety deficiencies.

3. Individual **Department Health and safety committees** are responsible for:
   (a) Reviewing and recommending adoption of environmental health and safety policies.
   (b) Monitoring the effectiveness of health and safety programs
   (c) Advising the administration on the status of health and safety programs and establishing program emphasis.

4. The **Department of Environmental Health and Safety** is responsible for:
   (a) Developing relevant and effective safety programs and plans.
   (b) Providing safety and health related technical services.
   (c) Providing staff support to safety committees.
   (d) Assisting in developing environmental health and safety policies.
   (e) Operating hazardous waste disposal services.
   (f) Providing assistance to departments in acquiring training materials and resources.
   (g) Consulting with staff and employees about health and safety problems and concerns.
   (h) Reviewing policies, regulations and monitoring compliance with applicable statutes and State University System requirements.

5. **Supervisors, Faculty** and all other **persons in authority** are responsible for:
   (a) Providing safe and healthy environments in their area of control by incorporating health and safety considerations in all activities at the university.
   (b) Being aware of the health and safety need of all students, co-workers and employees under their control or influence.
   (c) Observing, initiating and enforcing necessary measures to control hazards.
   (d) Providing oversight to ensure proper use of personal protective equipment, local exhaust ventilation, medical monitoring, etc.
   (e) Ensuring employees are properly trained prior to beginning new tasks.
   (f) Reporting injuries and illnesses to the Human Resources Office .
   (g) Reviewing accident and injury reports for their areas.
   (h) Serving as immediate contact for reporting health and safety concerns and problems.

6. **All** University of West Florida faculty, staff, and students are responsible for:
   (a) Participating in mandated training programs provided by supervisors and other instructors.
   (b) Performing activities as trained and considering the personal safety of others while performing assigned tasks.
   (c) Promptly reporting safety, fire, and health hazards, environmental deficiencies, as well as injuries and illnesses to the appropriate supervisor or department head.
   (d) Working in a safe manner by following established safety policies and procedures.

Written Programs

This written Environmental Health and Safety Program addresses the campus-wide application of overall responsibility of faculty, staff, and students. This Program contains Department specific as well as standards specific Environmental Health and Safety Program modules as well as Department policies and practices. As the program modules and departmental policies are developed and evaluated, this document will have additions, deletions and revisions. It is the intent of this program to be a "living" document that is, at a minimum, evaluated annually. All revisions must be written, submitted for approval, and contain revision dates.

Workplace Analysis

An effective, proactive safety and health program will seek to identify and analyze all hazards through Workplace Analysis.

Environmental Health and Safety hazards and "at risk" behavior by students, faculty and staff contribute greatly to the incident of injury and illness. Identifying potential hazards and changing behavior by training are two methods of controlling hazards and reducing injury. Identifying and eliminating existing hazards is the quickest way of reducing risk.

Workplace analysis consists of a literature review, identification of hazard categories, workplace surveys, and an analysis of trends. The purpose of a workplace analysis is to recognize existing and potential hazards, to identify employees at risk, and to establish and subsequently to evaluate the control measures.

Initially, the workplace analysis will establish a baseline. Then it must become a continuous and ongoing process to recognize, identify, and control occupational hazards. The frequency

of workplace analyses depends on the specific characteristics of the hazards and the work environment.

The workplace analysis may be performed on a specific area or problem or it may be done on a regularly scheduled basis in an area where a hazard has been identified. Workplace analyses also should be conducted when there are changes in procedures, equipment, or processes.

Literature Review

To facilitate the workplace analysis, a literature review may be helpful. This review should include current publications that describe potential university campus hazards and effective control strategies. The review enables personnel involved in the analysis to develop an understanding of potential hazards.

Identification of Hazard Categories

Based upon information gleaned from the literature, potential hazards can be anticipated. Potential health and safety hazards in the university campus environment can be categorized as follows: biological, ergonomic, chemical, environmental, mechanical, psychosocial, and physical. An inventory of these hazards should be maintained and used to develop and manage appropriate programs and to anticipate potential emergency situations.

Worksite Surveys

With a working knowledge of the potential health and safety hazards in the university campus environment, the next step is to perform a worksite survey, comprised of a walkthrough survey, job hazard analysis and exposure monitoring.

The purpose of the worksite survey is to identify and evaluate actual and potential hazards in a specific workplace. OSHA recommends comprehensive worksite surveys to establish safety and health hazard inventories. The surveys should be updated periodically as expert understanding of hazards and the methods of control in the university campus change.

Walkthrough

Regular site safety and health inspections, or walkthroughs, are recommended so that new or previously unrecognized hazards and failures in hazard controls are identified. A walkthrough of the worksite should begin with discussions with the managerial staff, and employees. During this discussion, the leader of the group assigned to perform the walkthrough should explain the process and purpose of the activity. Departmental representatives should provide an explanation of activities and present any departmental health or safety concerns. These discussions are likely to reveal problems that are not easily detected by visual inspection alone.

The walkthrough is done by physically walking through the worksite and noting as many hazards as possible. **(Appendix D describes possible hazard categories.)** The walkthrough group members should observe the work processes, methods and practices, engineering and administrative controls in place and personal protective equipment used. Checklists can be useful to facilitate a systematic and comprehensive survey approach.

During the walkthrough the survey team should ask the supervisors and employees to ask any additional questions that may arise. Examples of questions that may be helpful are as follows:

- Have common safety or health problems been noticed among the workers?
- Do any hazards exist that are not on the checklist?
- Do the employees have any questions about occupational safety and health?
- Are there any additional safety and health concerns or suggestions?

A diagram of each department should be developed to include the number and location of employees and the sources of potential exposure to hazards.

Hazard Analysis

When indicated, a hazard analysis should be done after the walkthrough to further assess the hazards of specific jobs, processes, and/or phases of work. A hazard analysis is an orderly process for locating and evaluating hazards that are most probable and have the severest consequences. This is information essential for establishing effective control measures. The hazard analysis involves selecting the jobs or processes to be analyzed, carefully studying and recording each step, identifying existing or potential hazards (both safety and health), and recommending changes to eliminate or reduce the hazards. Recommendations following a hazard analysis could include, among others, substitution of a less hazardous chemical, facility alterations, equipment and materials selections, or redesign of the job tasks.

Ideally, a hazard analysis should be conducted on all jobs or processes in all departments and should consider the following:

- Frequency of accidents or illnesses
- Potential for injuries or illnesses
- Severity of injuries or illnesses
- New or altered equipment, processes or operations

To be effective, a hazard analysis must be reviewed and updated periodically, perhaps annually. If an accident, injury, or illness is associated with a specific job or process, the hazard analysis should be reviewed immediately to determine whether changes are needed.

Exposure Monitoring

When the comprehensive work analysis identifies existing and potential health hazards, exposure monitoring is used to evaluate the employee's level of exposure. It is important to recognize that exposures must be measured while work is occurring. There are several methods of monitoring occupational exposures:

- Environmental monitoring is a program of observation and measurement used to determine levels of exposure to a specific substance in a worksite.
- Area sampling monitoring is done by measuring the contaminants in the air in the employee's work area.
- Personal samples are used to measure air contaminants in the employee's breathing zone.
- Biological monitoring is the measurement of a chemical, its metabolite, or a non-adverse biochemical effect in a person to assess exposure.

Accident and Record Analysis

An effective program will analyze injury and illness records for indications of sources and locations of hazards, and jobs that experience higher numbers of injuries. By analyzing injury and illness trends over time, patterns with common causes can be identified and prevented. In addition, an effective record keeping program will provide for investigation of accidents and "near miss" incidents, so that their causes, and the means for their prevention, are identified.

OSHA 200 Log (or equivalent form)(Optional)

The OSH Act of 1970 requires private sector employers with 11 or more employees to collect and maintain injury and illness records for their own employees at each of their establishments. The U.S. Department of Labor's publication, Recordkeeping Guidelines for Occupational Injuries and Illness, is the OSHA document that explains how cases are to recorded on the OSHA 200 log. To correctly complete the OSHA 200 log, employers must follow the guidelines carefully.

Every OSHA recordable injury and illness must be recorded on an OSHA log 200 (or equivalent) within six working days from the time the employer learns of the injury or illness. This log is maintained on a calendar year basis and must be retained for five years at the establishment.

Each year the employer must post the annual summary of the previous calendar year's occupational injuries and illnesses for the university campus. Although the summary is defined as a copy of the year's totals from the OSHA 200, it is, for the most part, the right-hand side of the OSHA 200 (a dotted line divides the OSHA 200). The employer must post the OSHA 200 Summary in a conspicuous place or places where notices to employees are customarily placed. The employer must post this by February 1 and it must remain posted until at least March 1.

Recordable Injuries and Illnesses

When determining whether to record a case on the OSHA 200 log, noting that the record keeping guidelines classify injuries and illnesses differently is important.

- An occupational injury is an injury such as a cut, puncture wound, fracture, sprain or strain, which results from a work accident or from an exposure involving a single incident in the work environment. Injuries are always the result of ***instantaneous events***.
- An occupational illness is any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with employment.
  Examples are: tuberculosis, asbestos-related diseases, and chronic chemical sensitivity. Illnesses are always the result of ***exposures over time***.
- All occupational deaths and nonfatal illnesses are recordable. Nonfatal occupational injuries are recordable only if they involve one or more of the following:
  - loss of consciousness
  - restriction of work or motion
  - transfer to another job
  - medical treatment, beyond first aid.

Analysis of Trends

OSHA recommends that injury and illness trends be analyzed over time, so that patterns with common causes can be identified and prevented. Two procedures for doing this are passive surveillance and active surveillance.

Passive Surveillance

***Passive* surveillance** utilizes existing data (i.e., OSHA 200 log) to describe past trends. Documentation that is collected through record keeping provides data for analysis of trends.

The availability and access to these records will depend on the university campus's policy and log limitations such as access to employee's medical records. The person accessing and reviewing these records must be cognizant of the limitations of access to this, and all, information.

Active Surveillance

Active surveillance involves collecting data (i.e., laboratory data) that is not currently documented. This surveillance creates data to describe current trends and identify problem areas. The data can be obtained from sources such as questionnaires, screening, or surveys. An example of this type of surveillance is a symptom survey that could be given to employees in a department with a suspected occupational hazard.

This survey can be used with other surveillance techniques to determine if a problem exists.

Incident or Accident Reports

Incident or accident reports are used to obtain information about the cause of accidents and "near miss" incidents and to identify hazardous areas or practices. Supervisors should complete an incident or accident report for each accident even when only a minor injury or no injury occurs. Supervisors and employees must understand the importance of completing these forms and their responsibility to do so.

Access to Employee Medical and Exposure Records

OSHA's Access to Employee Medical and Exposure Records Standard, 29 CFR 1910.20, requires employers to maintain certain employee medical and exposure records. The standard is limited to medical and exposure records produced because of an employee's exposure to toxic substances and harmful physical agents. Employees, or their designated representatives, have a right to review their individual employee medical records and records describing employee exposures. Access by other persons (such as supervisors or other agency representatives) is prohibited.

Employee Medical Records

An employee medical record is one concerning the health status of an employee, which is made or maintained by a physician, registered nurse, or the health care professional or technician. Each employee medical record must be maintained for the duration of employment plus 30 years, unless a specific occupational safety and health standard requires a different period. In addition, the medical records of employees who have worked for less than one year for the employer need not be retained if they are provided to the employee upon the end of employment. Laboratory reports and worksheets need to be kept for only one year. Examples of medical records are records concerning HIV/HBV status and Mantoux skin testing for TB infection. These records are considered confidential and access to them is strictly limited.

Employee Exposure Records

An employee exposure record is a record containing the information about employee exposure, such as the following:

- Environmental monitoring, specific sampling results, the collection methodology, a description of the analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained.
- Biological monitoring results that directly assess the absorption of a hazard.
- Material safety data sheets or a hazard inventory that describes chemicals and identifies where and when they are used.

Each employee exposure record must be maintained for at least 30 years, unless a specific occupational safety and health standard requires a different period.

Confidentiality of Records

OSHA is sensitive to the issue of personal privacy. While employee medical and exposure records are subject to the strict confidentiality requirements of the Access to Employee Medical and Exposure Records Standard, 29CFR 1910.20, the OSHA 200 log is not considered a medical record. The use of coded personal identifiers on the OSHA 200 or the OSHA 101 form is not permissible. All cases on the log must contain the employee's name.

Hazard Prevention and Control

Work force exposure to all current and potential hazards should be prevented or controlled by using engineering controls wherever feasible and appropriate, work practices and administrative controls, and personal protective equipment.

University campus policies and procedures should be written to describe the use of appropriate methods of control such as engineering, work practice, and administrative controls, and appropriate personal protective equipment. These methods are sometimes organized into a "hierarchy of controls" to indicate that some methods of control are preferred over others.

Engineering Controls

Engineering controls are the preferred method for controlling hazards at the University. Engineering controls involve physical changes to the work station, equipment, facility, or any other relevant aspect of the work environment. Some examples of engineering controls include enclosure or encapsulation of the hazard, substitution of less hazardous chemical or device, remote location of controls used by the device, or by eliminating the need to use the hazardous device.

Work Practice Controls

Work practice controls - another preferred control method - reduce the likelihood of exposure to occupational hazards by altering the manner in which a task is performed. An example of a work practice control is prohibiting motor-driven carts on walkways, requiring the use of gloves when using trimming devices on vegetation, or requiring lifting assistance on items weighting more than fifty pounds.

Administrative Controls

Administrative controls are procedures that significantly limit daily exposure by control or manipulation of the work schedule or in a manner in which work is performed. Administrative controls do not eliminate or limit the hazard. Consequently, the controls must be consistently used and enforced. Examples of administrative controls include restriction of access to utility vaults, short-term exposure to noisy environments, good housekeeping policies that eliminate obstacles from the work area and removal of tripping hazards.

Personal Protective Equipment

Personal protective equipment is specialized clothing or equipment worn by an employee for protection against a hazard. Personal protective equipment typically is used when other engineering and work practice controls are not feasible or until other controls can be implemented. Traditionally, personal protective equipment serves as a supplement to minimize employee exposure, not as a primary source of control. Examples of personal protective equipment include, but are not limited to, rubber boots, gloves, gowns, face shields or masks, and eye protection. Personal protective equipment that is required by a specific policy or standard must be accessible and provided in appropriate sizes at no cost to the user. The Department, through the responsible supervisor, must ensure that protective equipment is properly used, cleaned, laundered, repaired or replaced, as needed or properly discarded.

Medical Program

An effective safety and health program at the University must include a suitable medical monitoring program that should be appropriate for the health hazards present at the university.

The medical program should include medical surveillance, monitoring, removal and reporting requirements that comply with OSHA standards.

Employees must report early signs/symptoms of job-related injuries or illnesses and receive appropriate treatment.

Maintenance

An effective safety and health program on the university campus will also provide for facility and equipment maintenance, so that hazardous breakdowns are prevented. A preventive maintenance schedule should be implemented for areas in the university campus where it is most needed under normal circumstances. Compliance must be met with all manufacturers' and industry recommendations and consensus standards for maintenance frequency. In addition, repairs for safety-related items should be expedited and safety device checks should be documented.

Emergency Response

There should be appropriate planning, training/drills, and equipment for response to emergencies. In addition, first aid/emergency care from trained staff should be readily available to minimize harm if an injury or illness occurs.

Planning and preparing for emergencies are essential parts of the safety and health program. All employees should know exactly what they must do in each type of emergency situation. It is important that university plan and prepare for emergencies, including weather and fire, [29 CFR 1910.38] and emergency response operations to handle releases of hazardous substances [29 CFR 1910.120]. Training drills are needed so that in crisis situations the responses become automatic. Appropriate alarm systems must be installed to notify employees of an emergency.

Emergency response plans for dealing with hazardous substances should be prepared by persons with specific training. Planning must extend to how to handle spills and incidents involving chemicals in routine use, including cleaning supplies and disinfectants. Adequate supplies of spill control and personal protective equipment appropriate to the particular hazards onsite must be available. In some cases the employer's plan for dealing with hazardous chemical spills may be to evacuate and call the fire department or other hazardous materials organization.

Safety and Health Training

Safety and health training should cover the safety and health responsibilities of all personnel who occupy the university campus. It is most effective when it is incorporated into other training about performance requirements and job practices. It should include all subjects and areas necessary to address the hazards in the university.

OSHA considers safety and health training vital to every workplace and it is an important component of a comprehensive program. Training helps employees develop the knowledge and skills they need to understand workplace hazards and how to handle them in order to prevent or minimize their own exposure.

Before training begins, be sure that the university policy clearly states the its commitment to health and safety and to the training program. This commitment must include reasonable access to training. The training should be in the language that the trainee understands and at a level of understanding appropriate for the individuals being trained. Both management and employees should be involved in the development and delivery of the program.

Documentation of training must be maintained where such training is required by a standard. OSHA requires that such documentation be available for review by compliance officers in the event of an inspection. Documentation of training assures that initial or periodic training is accomplished within established time frames.

Identifying Training Needs

New employees need to be trained - not only to do the job, but also to recognize, understand and avoid potential hazards to themselves and others in the workplace. Contract workers also need training to recognize the hazards of the workplace. Experienced workers will need training if new equipment is installed or a process changes. Employees needing to wear personal protective equipment and persons working in high risk situations will need special training.

Periodic Safety and Health Training

Some worksites experience fairly frequent occupational injuries and illnesses. At such sites, it is especially important that employees receive periodic safety and health training to refresh their memories and to teach new methods of control. New training also may be necessary when OSHA or industry standards require it or industry practices are revised.

One-on-one training is often the most effective training method. The supervisor periodically spends some time watching an individual employee work. Then the supervisor meets with the employee to discuss safe work practices, bestow credit for safe work, and provide additional instruction to counteract any observed unsafe practices. One-on-one training is most effective when applied to all employees under supervision and not just those with whom there appears to be a problem. Positive feedback given for safe work practices is a very powerful tool. It helps employees establish safe behavior patterns and recognizes and thereby reinforces the desired behavior.

Evaluations

Evaluations help to determine whether the training you have provided has achieved its goal of improving your employees' safety performance. Some ways that one can evaluate a training program include:

- Before training begins, determine what areas need improvement by observing employees and soliciting their opinions. When training ends, test for improvement. Ask employees to explain their jobs' hazards, protective measures, and test new skills and knowledge.
- Keep track of employee attendance at training.
- At the end of training, ask participants to rate the course and the trainer.
- Compare pre- and post-training injury and accident rates, near misses and percent safe behavior exhibited.

Sources of Assistance

Additional help in developing training programs and identifying training resources can often be obtained from insurance carriers, corporate staff, or personal protective equipment suppliers. OSHA-funded consultation projects for small business can also provide some resources for training.

Administrator Training

Administrators, such as presidents, vice-presidents, deans and university department heads, should receive training and education to ensure continuing support and understanding of the safety and health program. It is the supervisor’s responsibility to communicate the programs goal and objectives to their employees, as well as to assign safety and health responsibilities and to hold subordinates accountable. In addition to the general orientation training outlined below, supervisors should receive information from the safety and health committee about the current components of the program, the program's effectiveness and recommendations for improvements.

Supervisor Training

Supervisors may need additional training in hazard detection, accident investigation, their role in ensuring maintenance of controls, emergency response and use of personal protective equipment. Supervisors should reinforce employee training through continual performance feedback, and through enforcement of safe work practices.

Employee Training

Faculty, staff and students must be trained so that they understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards. After initial work assignments are made, employees should receive a general orientation on university campus safety and health hazards and the elements of the safety and health program and procedures. This general training should include an explanation of the following:

- the health and safety program, policies and procedures;
- relevant safety and health regulations;
- hazardous materials (including housekeeping or maintenance chemicals and materials) and how to handle, store, manage and dispose of them;
- regulated waste and infectious materials (including bloodborne pathogens) and how to handle, manage, and dispose of them;
- electrical safety and hazard prevention;
- walking and working surfaces (including wet floors in kitchens or hallways);
- back-injury prevention and other ergonomic issues (including resident lifting and transfer, food handling, laundry and maintenance tasks);
- fire prevention and protection;
- workplace violence prevention (including avoiding injuries from residents);
- accident and illness reporting procedures (including reporting unsafe conditions such as frayed electrical, slippery floors from spills or malfunctioning equipment, etc.);
- infection control precautions;
- material safety data sheets (MSDSs) and other information resources for chemicals;
- disaster preparedness and response; and job and hazard specific training (such as specific procedures for lock-out or tag-out of machinery prior to maintenance or repair work).

Regular Program Review and Evaluation

With all of the safety and health program elements in place, a formal program review and evaluation should be completed to measure the achievement of established goals and to evaluate program outcomes.

OSHA recommends that program operations be reviewed at least annually to evaluate their success in meeting stated goals.

Members of the safety committee, including employee representatives should conduct the program review and evaluation. The program review and evaluation should measure outcomes, such as the attainment of goals and objectives, trend analysis, and program effectiveness. These outcomes can be evaluated by using employee interviews and testing, and by observing work practices to determine whether employees understand the health and safety policies, procedures, and training. Program effectiveness also may be evaluated by observing both overall and unit trends in occupational injuries and illnesses.

For example, if one of the safety and health committee's goals is "to complete the training for bloodborne pathogens compliance for all exposed employees before (a certain date)," then the program review and evaluation should measure the attainment of this goal. The evaluation might include interviews with employees, a review of training records, and a walkthrough of areas where exposed employees work to observe implementation.

In reviewing and evaluating the university campus safety and health program, data should be compiled from activities related to the worksite analysis, hazard prevention and control,

training and education, and record keeping. The information gathered from this process should be communicated to all members of the university campus community, including senior management, through the safety and health committee. The program review and evaluation should be used to determine any program elements that need to be altered to continually improve the overall effectiveness.

Conclusion

This document provides a framework for a comprehensive occupational health and safety program for the University of West Florida. This guide will be helpful to personnel responsible for developing and evaluating additional Health and Safety Program Modules and Department policies and procedures.