



POLICY STATEMENT

Accident and Injury Prevention Policy

SU Policy Number: 405-001.0

ORIGINATING OFFICE

Environmental Health and Safety, under the direction of Facilities Management and Planning

PURPOSE

Shippensburg University (the University), through instruction, research, and community service, is fully committed to protecting the safety and health of all students, faculty, staff, and visitors. This comprehensive Accident and Illness Prevention Plan (AIPP) has been developed to provide guidance in the administration of the accident and illness prevention plan for the University. It is designed to aid in the prevention of accidents and illnesses for all students, faculty, staff, and visitors who utilize the campus.

SCOPE

All employees and students shall be expected to fully comply with all aspects of this AIPP, and to ensure visitors coming into their areas are protected from hazards. Additionally, all students, faculty and staff are responsible for maintaining compliance with established safety policies, Pennsylvania Labor and Industry Standards, Pennsylvania Department of Environmental Protection Standards, Federal Environmental Protection Agency Standards, and Fire Prevention Codes.

OBJECTIVE

The objective of this program is to provide a safe and healthy environment for all students, faculty, staff, and visitors that work or utilize the University campus, and to reduce the overall number of injuries and illnesses caused as a result of activities undertaken on campus property.

Annually, the University Safety Committees, in conjunction with the Environmental Health and Safety Manager, shall review this AIPP, as well as the University's injury and illness data. Underlying factors contributing to workplace injuries and illnesses shall be identified, and necessary improvements and program goals shall be proposed campus-wide in an effort to reduce the overall number of incidents. All goals shall be measurable, realistic, and determined to be effective in improving University safety in a timely manner.

Once the proposed goals have been developed, the University Safety Committees shall submit them to the Environmental Health and Safety Manager for comment and/or formal University approval. Once approved, all University Departments will be provided with a copy of updated goals to review with each employee. Furthermore, the University Safety Committees will regularly check in with each Department

to assess the progress and status of the goals in regards to their implementation and employee notification.

RESPONSIBILITIES

1. Administration

Program responsibilities begin with University Administration. Administration shall provide the necessary support and funding required to accomplish the necessary set of objectives, and will work to support the goals and objectives of the AIPP and respond to all recommendations in a timely manner.

2. Department Directors

Department Directors must take the lead role in providing support at their various levels and pass that support on to their workforce. In addition, Directors shall work to ensure the following:

- a. Motivate employees to work safely
- b. Be alert for unsafe employee acts and correct through training
- c. During the budget process, commit resources to assure that identified hazards are promptly corrected and that all employees are provided with the tools and equipment needed to safely perform their job(s)
- d. Provide all employees with appropriate safety devices, safeguards, and personal protective equipment (PPE)
- e. Routinely conduct surveys and inspections to assess program effectiveness and employee compliance

3. Supervisors

Supervisory Personnel are responsible for the employees who work under their jurisdiction.

Supervisors shall work to ensure the following conditions are met:

- a. Assure effective implementation of the accident illness prevention program within their areas of responsibility
- b. Regularly perform inspections of employee work areas and equipment
- c. Assure that all employees comply with the safety procedures and rules
- d. Ensure that employees are provided with and use appropriate safety devices, safeguards, and PPE
- e. Assure that all employees receive required safety training and that they are knowledgeable of the accident and illness prevention criteria applicable to their jobs
- f. Notify employees of safety rules/criteria and potentially hazardous exposures to hazardous chemicals and toxic materials
- g. Assure that accidents, injuries and illnesses are promptly reported and thoroughly investigated

4. Employees

Employees are expected to work in a safe manner regardless of the work being performed, to follow established work guidelines and procedures, and to use recommended safety equipment for all tasks requiring their usage. Additionally, all employees shall ensure the following conditions are met:

- a. Maintain understanding and knowledge of all safety rules and regulations applicable to their jobs
- b. Promptly report any and all unsafe conditions to their supervisors
- c. Report any and all accidents or injuries to their supervisor
- d. Attend all trainings as required
- e. Never, under any circumstances, remove or bypass any safety guard or device
- f. Use only equipment and machines that are in good condition and in proper working order

PROCEDURES

Inspections

Regular inspections of all work areas and buildings are an important measure in minimizing workplace injuries and illnesses. Supervisors are directly responsible for performing inspections. Inspections shall be conducted to identify existing and potential health and safety hazards. The frequency of inspections depends on the timeframe specified in existing regulations (e.g. weekly, monthly, annually, etc.), and/or the nature of the worksite; therefore, each Department shall maintain a schedule of all required inspections.

Additionally, inspections will also be conducted each time a new hazard is introduced into the workplace. It should be noted that employees are responsible for inspecting their own work areas and equipment for hazards and unsafe conditions prior to beginning work each day. Employees shall immediately report all unsafe conditions to their supervisors and may not continue work until corrective actions have been taken.

Inspections may be performed by individuals and/or in teams consisting of employees and supervisors. The Environmental Health and Safety Manager may serve as a consultant to inspection teams, and at the request of a Supervisor may assist with actual inspections. Work Orders will be submitted to the appropriate Department's in order to ensure prompt correction of all safety deficiencies.

All inspections and findings shall be documented and will contain information including, but not limited to:

1. Location of inspection
2. Purpose of inspection
3. Date and time of inspection
4. Name(s) of persons performing inspection
5. Identified hazards
6. Corrective actions
7. Timetable for hazard correction

Corrective Actions

Once a hazard has been identified, an evaluation shall be performed to determine preventative measures to be taken, and for development of a suitable training for employees who are, or could potentially be exposed to the hazard. The Environmental Health and Safety Manager, in conjunction with University Safety Committees, are responsible for performing hazard evaluations on campus. Hazard evaluations will be performed periodically during scheduled inspections, and as necessary in response to specific requests.

Once a hazard evaluation has been completed, hazards will be corrected using the best method(s) available by means of elimination, substitution, or control (or any combination of these). To determine the best method of correction, consideration must be made in regards to the impact upon the operation or activity associated with the hazard.

The methods employed to correct hazards must be timely with respect to the severity of the hazard. The University recognizes that the risks posed by hazards can range from imminent dangers to hazards of relatively low risk. Accordingly, corrective actions may include a temporary termination of operations or shut-down of equipment, along with interim personal protective measures, until permanent corrective measures can be put in place.

INDUSTRIAL HYGIENE SURVEYS

Industrial Hygiene (IH) surveys will be conducted by the Environmental Health and Safety Manager, or by a qualified outside vendor, if conditions warrant their use in determining potentially hazardous situations and/or working conditions involving chemical, biological, and/or physical agents. In the event that an employee has a concern related to their safety in a specific work environment, they should immediately notify their supervisor who will then, in turn, notify the Environmental Health and Safety Manager. The EHS Manager, or qualified outside vendor, will conduct a preliminary investigation of the work environment before determining the need for further evaluation. Under certain circumstances, periodic and/or scheduled testing for certain contaminants (mold, radon, etc.) may occur regardless of whether or not an area was determined to contain a potential hazard.

All IH surveys shall be conducted following established methodologies as recommended by the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the National Institute on Occupational Safety and Health (NIOSH), and/or other nationally recognized organizations.

Results of IH surveys will be shared with all affected employees. Workplace exposures which exceed established permissible exposure limits (PEL's), or other hazards identified during the survey, will be corrected using appropriate engineering or administrative controls, or by requiring the use of personal protective equipment during all work performed in a specific work area.

INDUSTRIAL HEALTH SERVICES

Depending on an employee's job title, on occasion it may be necessary to utilize external medical services, consultants, specialists, counselors, or other professionals in the monitoring, testing, screening, and/or evaluation of an employee's ability to safely perform their job. Such instances include, but are not limited to:

1. Operating a motor vehicle requiring a Commercial Driver's License (CDL)
2. Operating heavy equipment (examples include cranes, high-lifts, forklifts, etc.)
3. Use of personal protective equipment

Each Department Manager, working in conjunction with the Environmental Health and Safety Manager, will be responsible for identifying job tasks or functions, and/or other areas within their operations, which could require an employee to participate in an industrial health program. Employees will be notified in advance of the requirement to participate, and the date, time, and location of any medical monitoring, testing, screening, and/or evaluations required. The Department manager will ensure that records generated from any medical monitoring, testing, or clearances are securely stored following the University's medical records policy.

The monitoring, testing, screening, and/or evaluation may include, but are not limited to:

1. Hearing conservation screening
2. Respirator use
3. Employee injury treatment and case management
4. Pre-placement physicals required to work in certain areas
5. Educational seminars
6. Wellness programs
7. Fit-for-duty/Return-to-work evaluations
8. Prompt treatment of work related injuries and illnesses

9. Physical therapy
10. On-site breath alcohol testing
11. Drug and alcohol awareness seminars
12. Response team participation

AIPP ORIENTATION AND TRAINING

It is expected that all University employees will receive various trainings throughout the year depending on their job function. Additional trainings may be required as necessary to assure employees fully understand their assigned roles and responsibilities in regards to their job functions and tasks they perform.

All new University employees will receive formal basic safety training during the new employee orientation process. This training is provided by University personnel and includes, but is not limited to, the following topics:

1. Chemical Safety and Employee-Right-to-Know
2. Fire Safety
3. Workers compensation and injury and illness reporting
4. Emergency preparedness and response

EMERGENCY OPERATIONS PLAN

The University has developed and maintains a detailed Emergency Operations Plan (EOP) intended to provide a clear method of action to be carried out by University Administrators, Public Safety Personnel, and Facilities Operations in the event of an unforeseen event or occurrence causing disruption to normal activities.

The emergency procedures outlined in the EOP are intended to facilitate the protection of lives and property through a unified response by University officials and the campus community. The EOP will take effect whenever a situation reaches proportions that can no longer be handled under routine guidelines and will be initiated by the president or his designee. The EOP may involve surrounding municipalities, local, state, and federal governments. Not all emergencies will warrant outside involvement, and the University will utilize all available internal resources before calling for outside help. A copy of the EOP is maintained by the Chief of Police, and is located in the Reed Operations Center. Please contact the Department of Public Safety to request time to view a copy of the EOP.

EMPLOYEE AIPP SUGGESTIONS AND COMMUNICATION

Communication between all University Departments is essential in ensuring the safety and well-being of all employees. Information regarding safe working conditions and practices, and hazard control is included in new employee training provided at the start of employment. Any employee given a new job assignment for which specific training has not previously been received shall also be re-trained. Additionally, whenever new substances, processes, procedures, or equipment representing a new hazard is introduced into the workplace, training will be provided.

Bulletin boards are utilized throughout the University to post communications to the general workforce, and/or to select groups of employees only depending on job function. University Safety Committees meet as needed to discuss current issues and to identify potential hazards. The purpose of the meetings is to eliminate and/or correct all hazards before an injury or illness can occur.

From time to time, the campus newspaper may also be used to distribute information on various safety topics. Campus email can also be used to target a specific group of employees, or to distribute information campus-wide.

AIPP EMPLOYEE INVOLVEMENT

University Safety Committees meet and discuss issues pertinent to the campus, and recommendations are made to correct all concerns. Employees are encouraged to take an active role in the University's safety programs. There are multiple ways that employees can become involved, including:

1. Participating in a University Safety Committee
2. Completing or reviewing hazard surveys
3. Assisting or providing employee safety trainings
4. Participating in employee wellness and/or health programs

Employees are encouraged to submit suggestions (either in person, or confidentially) regarding potential safety hazards. The University Safety Committee shall review the suggestions and depending on the nature of the hazard, and will ensure deficiencies are corrected for the benefit of all employees.

ESTABLISHED SAFETY PROCEDURES AND ENFORCEMENT METHODS

Safety Procedures

Standard operating procedures and safety practices, when followed and fully understood by all employees, are proven effective in reducing, controlling, or eliminating potential risks to employees. Supervisors/Department Heads are responsible for confirming that appropriate safety rules and practices are in place for all areas in which their employees work, or for areas which their employees may reasonably be expected to work during a normal work shift. Supervisors/Department Heads are accountable for ensuring their employees are trained on, and are fully compliant with standards and regulations applicable to their job task. Should the need arise, the Environmental Health and Safety Manager is available to assist Department Heads with the development of job specific safety procedures for their areas.

Enforcement

The University uses progressive discipline in order to enforce safety rule infractions. The process of verbal warning, written warnings and counseling, time off with or without pay, and termination can all be used depending on the situation and the level of offense. Not complying with a safety rule can range from a non-serious offense to a highly dangerous, oversight versus deliberate action, and isolated impairment versus repeated offenses. All discipline must comply with current collective bargaining agreements, must be fair, and must be appropriate for the situation. Employees that are not included in the collective bargaining agreement will be subject to the same enforcement and discipline policies and procedures as employees in the bargaining unit.

ACCIDENT INVESTIGATION, REPORTING AND RECORDKEEPING

The purpose of performing an accident investigation is to identify the cause(s) which may have led to an accident. It is important to note, that the purpose of an accident investigation is not to place blame on any one individual, but rather to assess the circumstances surrounding the accident so that preventative actions can be taken to prevent similar incidents from occurring in the future. Accident scenes are secured until such time as the investigation can be completed. If necessary, a property damage investigation may also be completed as soon as possible after an accident.

Timely reporting of accidents is essential. Just as with the initial investigation, all Shippensburg University Injury and Illness Report Forms are to be completed and filed as soon as possible after the

incident has occurred. Statements may be taken from the victim(s) as well as any potential witnesses. Similar to the accident investigation, the purpose of an accident report is not to place blame, but rather to gather facts that may be used in order to prevent similar situations from occurring in the future. All Injury and Illness Report Forms must be signed by both the affected individual and their immediate Supervisor.

At a minimum, once first aid has been rendered, emergency rescue or evacuation has taken place, and the appropriate university officials have been notified, the following actions will be taken by the supervisor:

1. Secure the accident site to prevent any additional injuries from occurring as a result of the same hazard
2. Preserve and document all evidence, including taking pictures of the accident site
3. Obtain names of and statements from all involved persons, as well as any potential witnesses
4. Initiate completion of an Injury Report
5. Work with Environmental Health and Safety Manager to identify contributing causes and to recommend corrective actions to prevent future occurrences

The Environmental Health and Safety Manager and Human Resources will be involved in investigating every accident/injury/illness that happens on University property. It is crucial that all supervisors document all information they have obtained as a result of their initial investigation. Following completion of the investigation, recommendations are provided to the appropriate managers in charge of the areas in which the accident occurred.

All Injury and Illness Report Forms are maintained by the EHS Department.

FIRST AID, CPR, AED, AND OTHER EMERGENCY TREATMENT

University Police and the Environmental Health and Safety Manager are considered to be First Responders and will maintain training in basic first aid procedures, performing CPR, and in the usage of AED's. The nursing staff at the Health Center shall also maintain the same levels of training, but on a nursing level. Athletic trainers and members of all coaching staffs will have basic first aid and CPR, but may or may not be trained in the use of AED's. All trainings shall be given by personnel certified by the American Red Cross, or the American Heart Association. At a minimum, at any given time, ten (10) AED units are available on campus for cardiac emergencies. University Police maintain three of these units in patrol vehicles.

METHODS FOR EVALUATING AIPP PROGRAM EFFECTIVENESS

Annually, the University Safety Committee, in conjunction with the Environmental Health and Safety Manager, and the office of Human Resources, shall review this AIPP, as well as the University's injury and illness data, in order to evaluate the effectiveness of this program. Underlying factors contributing to workplace injuries and illnesses shall be identified, and necessary improvements and program goals shall be proposed campus-wide in an effort to reduce the overall number of incidents. All goals shall be measurable, realistic, and determined to be effective in improving University safety in a timely manner. Any outside resources necessary to complete the evaluation will be made available by Administration. Once the evaluation has been completed, the Environmental Health and Safety Manager will make recommended changes to the AIPP as required.

STANDARD OPERATING PROCEDURES

Standard Operating Procedures exist in writing for the University on the following topics:

1. Exposure Control
2. Substance Abuse
3. Pre-Operational Process Review
4. Hearing/Sight Conservation
5. Hazardous Materials Handling
6. Electrical Safety
7. Personal Protective Equipment
8. Machine Guarding
9. Confined Space Entry
10. Lockout/Tagout
11. Lightning Protection
12. Mail Handling

Copies of the above-listed procedures can be obtained by contacting the Environmental Health and Safety Manager at (717)477-1446, or mrdominick@ship.edu

RECISSION

APPROVALS

EMT, 10/23/2020

FILENAME:

405-001.0 Accident and Injury Prevention Policy

DATE:

10/23/2020

DISTRIBUTION:

Public