

# Cedarville University General Safety Plan

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# Introduction

This safety plan incorporates the important safety components to provide information to all faculty and staff and complies with OSHA requirements. It incorporates resources to assist you in achieving safe work environments, along with best practice tips that are noted throughout this document.

Many states have Occupational Safety and Health Administration (OSHA) approved State Plans. Ohio is under federal OSHA jurisdiction which covers most private sector workers within the state. State and local government workers are not covered by federal OSHA.

## Important tips:

- Any improvements to safety processes or the overall program should be tracked internally and may be communicated to our insurance carrier risk management, as necessary. This can help the university to receive more favorable rates and additional options at policy renewal time.
- Validate positive safety behaviors when noted within your department. This will help spread a positive safety culture for others to imitate.
- Some information in this document may not all seem relevant to some positions at the university depending on the nature of the duties performed, however all employees should be aware of how to report safety hazards and obtain information as needed.

# Section 1: Management Commitment to Safety and Health

**Cedarville University** strives to have the safest possible place of employment for our employees.

The goals for our Safety Program are to:

- ✓ Develop, implement, and maintain a safe workplace for our employees consistent with all applicable state and federal regulations.
- ✓ Control the costs related to workers' compensation insurance coverage.
- ✓ Consistently improve the safety program to minimize incidents, therefore ensuring our employees' long-term safety and wellness.
- ✓ Reduce the occurrence of incidents and celebrate a great safety record.

The position responsible for implementing and monitoring the Safety Program at Cedarville University is the Director of Campus Safety and Risk Management.

A copy of this Safety Program is located here:

Campus Security website found under the Safety heading <a href="https://www.cedarville.edu/offices/campus-security/safety">https://www.cedarville.edu/offices/campus-security/safety</a>

A written hard copy is available in the Campus Safety & Risk Management Office in the Operations Center.

# Section 2: Roles and Responsibilities Employer Responsibilities

Under the Occupational Safety and Health Act (OSHA), it is the employer's responsibility to provide employees with a workplace free of recognized hazards that may cause illness or serious physical harm and to comply with standards, rules, and regulations issued under the OSHA Act.

Management must lead by using a variety of techniques to demonstrate the institutions commitment to workplace safety and health.

Managers may demonstrate their commitment in a variety of ways, such as:

- Attending safety meetings.
- Setting an example by following safety rules and regulations.
- Allowing employees free access to tools and equipment necessary to perform a job safely.
- Providing employees with training on specific safety issues and equipment.
- Attending employee training programs if appropriate to reinforce employee training.
- Participating in or leading safety and health committees if requested.
- Making presentations on safety and health topics within your department.
- Conducting regular inspections of your specific work area.
- Following up after safety incidents with thorough accident investigations, correcting problems and post-accident employee training.

## **Employee Responsibilities**

As much as it is Cedarville University's responsibility to provide a safe work environment for everyone, each employee plays a critical role in the success of the safety program. We ask employees to accept this important responsibility and commit to work in the safest manner possible to ensure their own individual health and wellness for the future. We encourage all employees to communicate freely about safety concerns and offer suggestions to improve safety conditions without the fear of reprisal.

Employee rights are protected under the **OSHA Act.** 

All employees are responsible to comply with all OSHA standards (federal and state) as well as with the company's safety and health rules, including the following:

- Handling equipment and work processes in accordance with established procedures and documented protocols.
- Reporting any unsafe conditions, deficiencies in equipment, or injuries (no matter how minor) to management immediately.
- Complying with all management instructions for safe conduct.
- Attending accident prevention and safety training and instruction, including practice drills.

- Obtaining permission and training before operating machinery or equipment unless part
  of the employee's regular duties. Employees must be trained/certified prior to using any
  powered industrial trucks, such as forklifts.
- Following the university's safe working rules and policies at all times.
- Wearing necessary safety and protective equipment at all times in specified work locations.
- Asking for clarification or assistance if unsure about the safety of a particular task and stopping the work immediately until there is clear guidance to proceed.
- Never participating in horseplay, scuffling, or other acts that endanger the safety or well-being of the work team.
- Not reporting to work under the influence of alcohol and/or drugs or being impaired by fatigue, illness, or other causes that may expose the employee or others to injury or unsafe working conditions.
- Lifting heavy objects using proper lifting techniques to prevent injuries.

All employees have the right to access safety records maintained by the university that document the employee's exposure to hazardous substances and individual medical records relating to evaluations, testing or exposures with certain exceptions.

## **Employee Injury and Illness Reporting**

All injuries should be reported promptly to the supervisor, manager, or Campus Safety representatives that include Campus Security officers so that arrangements can be made for medical and/or first-aid treatment and to ensure that the proper incident/injury reports have been completed.

First-aid materials are located throughout the campus within workshops, operations center buildings, food service preparation areas, and athletic facilities and with Campus Security Patrol Officers. Emergency response to medical, fire and other emergency situations can be obtained by calling 911 or Campus Security at 937-239-6491.

#### On-campus clinic location:

University Medical Services is located adjacent to the Fitness Recreation Center and Field House building. The clinic's primary function is to serve as a student health clinic and do not generally see faculty, staff, and visitors. Medical Services for faculty, staff and visitors should be obtained by contacting 911 or Campus Security as previously indicated.

The clinic operates on a Monday through Friday basis (from 8 am to 5 pm) during the academic school year only and is closed on weekends, holidays and during summer months. The clinic does not function as an "Emergency Room" facility and all serious health problems are referred to the local emergency facilities via EMS transport.

During the academic year, the campus has its own Emergency Medical Services squad that can respond to medical emergencies, but during the summer months the local EMS will respond.

Report any hazards immediately that are associated with an injury or illness to your supervisor, manager, or campus safety representative.

#### **Contact Information:**

For the Director of Campus Safety & Risk Management -

- Contact ext. 7993 during normal work hours,
- Call the 24/7 Campus Security number at 937-239-6491 at all other times.

## OSHA Inspections: Employee Responsibilities

It is our policy to comply and cooperate with any OSHA location inspection. Inspections typically occur due to an employee complaint, referral, or program inspections in certain industries or locations. The designated company safety representative will communicate and work directly with the OSHA inspectors. Immediately contact the Campus Safety Director who serves as our safety representative if OSHA inspectors arrive at the work location. The Director will also make the necessary contacts to University Administrative personnel.

The Cedarville University Campus Safety representative responsible for handling inspections is:

Name: Doug Chisholm or Ashley Halliday

**Phone Number:** Ext. 7993

**Email:** chisd@cedarville.edu or ahalliday@cedarville.edu

If the Campus Safety representative is not available, contact the Associate Vice President of Operations, Rod Johnson at 937-766-4114 or the Associate Vice President of Human Resources at ext. 937-766-7418.

# Section 3: Incident Investigation

It is the university's policy to investigate all injuries and illnesses in order to understand why the incident occurred and how it can be prevented from recurring. It will also serve to continuously improve our processes/procedures to create a safer workplace for all associates.

**Important tip:** Sometimes a full investigation and report cannot be done right away and there is limited information about the incident. In these instances, you should always submit a quick report with basic facts (employee name, short description, date, and any other details) about the incident so it can be submitted to the insurance carrier in a timely fashion. More information can always be added after the fact, but the report should always be submitted in a prompt manner.

The procedure for investigating employee incidents is outlined below:

- 1. In an emergency situation, remember to dial 911 immediately.
- 2. All employees should report any injury or illness immediately to their immediate supervisor/manager and complete the appropriate paperwork for the Safety Directors follow-up and review of the incident. All injuries and illnesses should be reported, no matter how serious or minor it may seem. Prompt reporting is also important for medical treatment and filing of workers' compensation.
- 3. Use the university incident report form and the workers compensation form FROR-1. Document the injury/illness completely while doing a thorough root cause analysis of the incident so that corrective action can be determined to prevent future incidents.
- 4. Review the incident investigation report with the employee and supervisor/manager to determine appropriate corrective action, training, or other changes in the safety program in that work area. Any corrective actions should be communicated clearly, with responsibility for follow up tasks assigned to the appropriate person(s), and adjustments made if needed.
- 5. Part of the safety corrections may include employee coaching and counseling to correct unsafe behaviors, prevent injuries, and improve safety. The focus should be on adherence to safety procedures for corrective action and on changing behavior instead of punitive actions. However, in some instances, after consultation with human resources and legal counsel, egregious or willfully negligent behavior may be cause for immediate disciplinary action up to and including termination of employment.

### Injury and Illness Reporting

In the case of serious injuries or fatalities, there are time-sensitive reporting requirements. Any serious injury should be reported as soon as possible in order to comply with OSHA's reporting rules, or the company may face severe penalties. The Director of Campus Safety in consultation with the Associate Vice President of Operations will handle OSHA reporting.

- For work-related fatalities, report within eight hours.
- For work-related inpatient hospitalizations (does not include ER visits), all amputations, and all losses of an eye, report within 24 hours.

## Section 4: Hazard Identification and Assessment

Part of our ongoing commitment to the Safety Program includes hazard identification and assessment. An area of focus under the OSHA general duty clause is to assess any potential hazards our employees may encounter through the normal course of their workdays. Cedarville

University follows the federal OSHA guidelines (listed below) for evaluating potential hazards in the workplace and will review the information as needed to prioritize action items for completion.

OSHA recommends that employers collect, organize, and review information with employees to determine what types of hazards may be present and which employees may be exposed or potentially exposed. Information available in the workplace may include:

- Equipment and machinery operating manuals.
- Safety data sheets (SDS) provided by chemical manufacturers.
- Self-inspection reports and inspection reports from insurance carriers, fire department
  officials, and consultants. Note: The frequency used to conduct self-inspections with the
  documented reports should be included. Frequency may vary and could be daily,
  weekly, monthly, or at other intervals depending upon the environment.
- Records of previous injuries and illnesses, such as OSHA 300 and 301 logs and reports of incident investigations.
- Workers' compensation records and reports.
- Patterns/trends of frequently occurring injuries and illnesses.
- Exposure monitoring results, industrial hygiene assessments, and medical records (appropriately redacted to ensure patient/worker privacy).
- Existing safety and health programs, such as lockout/tagout, confined spaces, personal protective equipment, and others. See list of programs below.
- Input from workers or suggestions received.
- Results of job hazard analyses, also known as job safety analyses.

Information about hazards may be available from outside sources, such as:

- OSHA, National Institute for Occupational Safety and Health (NIOSH), and Centers for Disease Control and Prevention (CDC) websites, publications, and alerts.
- Trade associations.
- State and local occupational safety and health committees/coalitions.
- Safety and health consultants.

The following list includes general safety programs that may be required based on our institutions exposures and any assessments (additional information is available for those programs listed below that are typically the areas with the most OSHA focus):

- Active shooter.
- Bloodborne pathogens.
- Confined space entry.

- Driving safety for non-commercial drivers.
- Electrical safety (electrical, wiring methods, components and equipment, general industry (29 C.F.R. § 1910.305) [related OSHA Safety and Health Topics page]; electrical systems design, general requirements, general industry (29 C.F.R. § 1910.303) [related OSHA Safety and Health Topics page]).
- Emergency action planning.
- Ergonomics.
- Fall protection (fall protection, construction (29 C.F.R. § 1926.501) [related OSHA Safety and Health Topics page).
- Fire safety.
- Fleet safety policy regulated.
- Forklift/powered industrial trucks (powered industrial trucks, general industry (29 C.F.R. § 1910.178) [related OSHA Safety and Health Topics page]).
- Hand tool safety.
- Hazard communication/GHS (general industry (<u>29 C.F.R. § 1910.1200</u>) [<u>related OSHA Safety and Health Topics page</u>]).
- HAZWOPER.
- Heat illness prevention.
- Hot work.
- Ladder safety (ladders, construction (<u>29 C.F.R. § 1926.1053</u>) [<u>related OSHA Safety and Health Topics page</u>]).
- Lockout/tagout (control of hazardous energy (lockout/tagout), general industry (29
   C.F.R. § 1910.147) [related OSHA Safety and Health Topics page]).
- Machine guarding (machinery and machine guarding, general requirements (<u>29 C.F.R. §</u> 1910.212) [related OSHA Safety and Health Topics page]).
- Medical services (including first aid/CPR/AED).
- Noise and hearing protection
- Personal protective equipment (PPE).
- Respiratory protection program (respiratory protection, general industry (<u>29 C.F.R. §</u> <u>1910.134</u>) [<u>related OSHA Safety and Health Topics page</u>])
- Scaffolding (scaffolding, general requirements, construction (29 C.F.R. § 1926.451)
   [related OSHA Safety and Health Topics page]).
- Spill prevention and response.
- Substance abuse policy.
- Workplace violence prevention program.

## Job Hazard Analysis

For certain jobs on campus, a job hazard analysis (JHA) can be utilized that can be helpful in outlining the steps and tasks of a job and any controls that are in place to avoid the potential hazard(s). They may also be used to build, update, and maintain the safety training and education program. If a supervisor or manager would like to utilize this particular system, they

may consult with the Director of Campus Safety to help facilitate the steps used in developing an analysis. The format for conducting a JHA has been included in this plan.

#### Job Hazard Analysis for (List Job or Work Process)

Date of evaluation:

Steps to perform the job/work process	Description of the hazards in each step	Action plan for hazard control	Degree of importance (Low, Med, High)	Other comments
Step 1				
Step 2				
Step 3				

Recommended times to use a Job hazard analysis:

- When occupational injuries and illnesses occur that may warrant a review.
- When new substances, processes, procedures, or equipment are introduced into the workplace that may be hazardous.
- When new or previously unidentified hazards are recognized.
- When employees provide feedback/suggestions that will lead to safety improvements.

### Personal Protective Equipment, Tools, and Hazard Communications

Personal protective equipment (PPE) and tools to safely perform the work will be provided to employees and properly maintained in accordance with manufacturer guidelines.

Supervisors and managers should be trained on the personal protective equipment that is required to do their jobs effectively. Each department should review any employee feedback on the use of this equipment and potential improvements that can be made.

Copies of the Cedarville University Hazard Communication Program and other information is listed on the Campus Security and Safety website under the "Safety" heading and available for employees to review at any time. A hard copy is also maintained in the Operations Center, Campus Safety Office. The Safety Data Sheet/chemical "right-to-know" information is also located here under the heading of MSDS online.

## https://www.cedarville.edu/offices/campus-security/safety

**Important tip:** According to OSHA's <u>hazard communications standards</u> that provide employees with the right to know and understand the potential hazards in their work environment, employers with hazardous chemicals in the workplace must develop and implement a written hazard communication program so employees can be aware of any hazards they are exposed to and proper precautions, including copies of accessible safety data sheets (SDS).

## Section 5: Hazard Prevention and Control

Regular inspections conducted by Campus Security Officers, Campus Safety Officials, Physical Plant personnel, and Fire Department Officials along with employee reports/feedback, and supervisory input and observations, allow us to keep hazard information current. With hazards continuously identified, they can be controlled or prevented using the following standard methods:

#### Safe Work Practices -

Implementation of special workplace rules may be necessary to continue to protect employees from hazards. Such special rules include specific procedures regarding the use of potentially hazardous equipment or materials, identification of safe acts or behaviors, lockout/tagout procedures, requirements for personal protective devices, and good housekeeping practices. Information about safety and security at Cedarville University can be located on the Campus Security website. Any questions can be directed to the offices of Campus Security and Safety.

#### • Engineering Controls -

When conducting certain jobs each department should strive to **eliminate or reduce** employee exposure to hazards. This can be done by completely removing the hazard from facilities, equipment, or processes through design whenever possible. When hazards cannot be eliminated or replaced with less hazardous alternatives, they may be enclosed. For example, moving parts of machinery or heat-producing processes may be enclosed with special materials. Finally, if hazards cannot be removed or enclosed, barriers will be put between employees and the hazards in the form of machine guards, ventilation hoods, or isolation of a process. These engineering controls will be reviewed with affected employees within the work area.

#### • Training -

Employees should be taught to identify and avoid hazards during orientation as well as receiving ongoing safety training based on their position that highlights any potential hazards they may encounter during the course of performing their job duties.

#### • Enforcement -

Safe work practices are a condition of employment, and any violation of workplace safety and health rules will be cause for corrective action, discipline, or termination of employment based on the seriousness of the violation. Enforcement will be based on letting employees know what is expected of them regarding workplace safety and health and giving them a chance to correct their own behavior.

#### Personal Protective Equipment –

Engineering controls and safe work practices may not completely eliminate hazards. Personal protective equipment — such as face shields, proper work shoes or boots, safety glasses, or hardhats — may be required and will be provided at no cost to the employees. Employees will be trained in the need for, and proper use of such equipment and the limitations of this equipment should be made clear to all employees.

#### Administrative Controls –

Administrative controls such as lengthened rest breaks, the use of additional relief workers, periodic breaks to reduce the physical stress on certain body parts, and rotation of workers through different jobs to reduce exposure to hazards may also be employed to help with the continuing control of hazards. Administrative controls should be used in conjunction with other controls that work to eliminate hazards and control exposure more directly.

#### • Preventive Maintenance -

Preventive maintenance is designed to eliminate equipment problems and plays a major role in ensuring that hazard controls continue to function effectively and that equipment malfunctions do not cause additional hazards. Ideally, preventive maintenance should be a continuous effort and performed in accordance with the manufacturer's recommendations.

Preventative maintenance should be documented and maintained in each department, as necessary.

## Section 6: Communication

Communication on safety issues is a vital part of achieving successful safety culture. Here are some of the ways that Cedarville University communicates with employees:

- Review of the safety program upon hiring or during onboarding orientation.
- Training topics covered in classroom or tailgate talks/standup meetings.
- Posters/signage/distributed content for compliance with all applicable state and federal regulations as well as company-specific exposures.
- Supervisors can schedule Department Safety meetings to keep employees current on relevant safety issues encountered in their specific workplace. These can be conducted periodically monthly, quarterly, annually, etc. The occurrence of injuries and/or illnesses may prompt immediate action. Copies of the safety meeting minutes should be maintained with follow-up action planning if necessary.
- Specific safety issues can be addressed in the "Campus Today" publication that is available online to all employees at the University. Certain topics can be addressed utilizing this method that may be relevant to the entire campus.
- If applicable, other means can be used to ensure safety communications with employees.

Employees should be encouraged to submit any safety concerns to their Department Managers/Supervisors, Department Chairs and Administrators or directly to the Campus Safety and Security Departments.

# Section 7: Training and Education Programs

Initial and ongoing safety training and education is necessary to ensure the safety of our employees. Safety orientation is the backbone of developing a safety program as it introduces new employees to our culture and commitment to safety. Ongoing training will also be conducted based on the employee department/position and any requirements, such as personal protective equipment, controls, safe work practices, and policies, etc.

The purpose of our training program is to provide employees with:

- Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.
- Provide awareness and understanding of workplace hazards and how to identify, report, and control them.
- Specialized training when their work involves unique hazards.

Safety training will be provided for employees:

- During new hire onboarding.
- When beginning new job assignments.
- When cross training on new types of machinery/equipment.
- When new substances, processes, procedures, or equipment are introduced to the workplace and represent a new hazard.
- Periodically, in the form of refresher training (this may be following a near miss or incident, which can be required).

Depending upon the topic, the training may be conducted with one of the following methods:

- Tailgate talks.
- Classroom training.
- Peer to peer training/shadowing.
- Online training.
- Coaching/counseling.
- Safety observations/evaluations.

**Important tip:** Effective training and education can be provided outside a formal classroom setting. Peer-to-peer training, on-the-job training, and worksite demonstrations can be effective in conveying safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.

# Section 8: Program Evaluation and Improvement

The main goal of our safety program evaluation is to ensure that Cedarville University is providing a safe workplace to meet and exceed our safety goals while continuously improving our safety culture. It is suggested that each department review their safety procedures on an annual basis or whenever needed due to the introduction of new protocols, equipment or adverse incidents that may have occurred. With these goals in mind, it will help to remain compliant with all applicable regulations and laws and maintain a safe work environment.

#### The evaluation may also:

- Verify that the core elements of the program have been fully implemented.
- Involve employees in some aspects of program evaluation, including reviewing information (such as incident reports and exposure monitoring results), establishing, and tracking performance indicators, and identifying opportunities to improve the program.
- Ensure that the following key processes are in place and operating as intended:
  - o Reporting injuries, illnesses, incidents, hazards, and concerns.
  - Conducting workplace inspections and incident investigations.
  - Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective and is completed promptly.
  - Collecting and reporting any data needed to monitor progress and performance.
- Review the results of any compliance audits to confirm that any program shortcomings are being identified and that actions are being taken that will prevent recurrence.
- Review and update plans/processes based on the university loss history.

The person tasked with the overall responsibility to evaluate Cedarville University's safety program as	าด
processes is:	

Name: Doug Chisholm or	Ashley Holiday
Contact Information:	Director of Campus Safety and Risk Management , ext. 7993

**Important tip:** The <u>OSHA self-audit tool</u> is an effective template to evaluate the safety program and create action plans for any needed improvements.

# Section 9: Recordkeeping

Cedarville University is responsible for maintaining records of all applicable safety-related programs. The records will be kept on file at Physical Plant Operations Center by the Director of Campus Safety and Risk Management.

The OSHA Form 300 log of work-related injuries and illnesses will be posted annually at the Human Resources, Hartman House on the Public bulletin board where other notices are posted. The log must be at least posted from February 1 through April 30 of each year.

A partial list of the most common regulations where document retention is required and/or recommended include:

**Bloodborne Pathogens:** If employees are expected to have work exposure to bloodborne pathogens, you are required to develop a written program and training to protect employees. Keep employee training records for at least three years from the training. Three years is the requirement, and safety experts recommend keeping all training records for the duration of employment. Retain employee exposure records for the duration of employment plus 30 years.

**Employee Exposure/Medical Records:** Retain employee exposure/medical records for the duration of employment plus 30 years.

**OSHA Form 300:** The OSHA Form 300 log of work-related injuries, illnesses and fatalities must be retained on file for five years following the year the records cover.

Certain partially exempt industries such as Cedarville University are required to report their OSHA 300 work related injury and illness records using an on-line program whenever OSHA requests them to do so. OSHA will provide this notification by mail. Certain high-risk industries must report them on an annual basis beginning in 2019. The University

**Occupational/Health Training records:** General training records are retained in the Campus Safety Department for a period of 10 years. This includes records for forklifts and other related industrial trucks. It is recommended that individual departments should retain their own department specific records if applicable for 3 years.

# **Employee Acknowledgment Form**

This form may be used by managers and supervisors as part of their employee orientation.

**SAFETY PROGRAM RESPONSIBILITIES:** I have received and read the University's safety rules and understand that I must abide by these rules at all times. I have been given a copy of these safety rules and instructed to refer to them on a regular basis. Whenever I see an unsafe work condition, I must report it immediately to my supervisor/manager and/or campus safety department.

**REPORTING ACCIDENTS AND UNSAFE CONDITIONS:** I have been informed and fully understand that it is my responsibility to report all work-related incidents of injuries or accidents, both my own and other employee incidents, at the time of the incident. I also understand that it is my responsibility to notify my supervisor/manager and campus safety department of any unsafe working conditions immediately so that the potential hazards can be assessed and corrected.

Employee Signature:	
Printed Name:	Date: