I. POLICY STATEMENT

Idaho State University (ISU or the University) is fully committed to protecting the health and safety of the University community while minimizing impacts on the Environment. The University is committed to complying with all applicable Workplace safety, health, and Environmental rules and regulations by promoting accident prevention, health preservation, fire prevention, Environmental protection, and a positive safety culture. The University will provide resources to carry out this policy and establish an organizational structure for occupational and Environmental health, safety, and sustainability responsibilities.

II. DEFINITIONS

A. Environment/Environmental: The natural world, especially as affected by human activity.

B. Hazard: Any real or potential condition that can cause injury, illness, or death; damage to or loss of a system, equipment, or property; or damage to the Environment.

C. Imminent Hazard: A situation which includes the possibility of death, serious injury, significant harm to the Environment, and/or significant damage to property if not immediately corrected; and/or a significant violation of laws, rules, or regulations.
D. **Workplace:** A location where students, employees, and/or third-party contractors perform tasks, jobs, and projects on behalf of the University, whether on University property or elsewhere.

E. **Unit:** A division, college, department, administrative or functional area governed by the University.

### III. AUTHORITY AND RESPONSIBILITIES

All members of the University community are expected to follow all applicable federal, state, and local laws and this policy. Violations of this policy may result in disciplinary actions. The University President has delegated responsibility for the administration of the University’s health and safety program to the Environmental Health, Safety, and Sustainability Department (EHSS). EHSS has the authority to pause or stop any activity that is found to be in violation of this policy; and/or applicable laws, regulations, rules, and/or ordinances.

A. **President, Vice Presidents, Deans, Directors, and Department Heads**

   1. Provide leadership and management support to ensure a safe and healthy work environment;
   2. Allocate sufficient resources for effective and compliant Environmental health, safety, and sustainability programs and facilities; and
   3. Require contracted business partners and affiliates to perform their work in a manner that protects the University from unnecessary Environmental and safety liabilities.

B. **Environmental Health, Safety, and Sustainability Department (EHSS)**

   1. Partner with and assist University Units to promote a safe and healthy Workplace, protection of the Environment, and compliance with applicable rules and regulations.
   2. Act as a liaison with federal and state safety/Environmental regulatory agencies when dealing with concerns impacting University activities.
   3. Stay abreast of regulatory changes and communicate changes to the campus community.
   4. Perform inspections and audits as needed or required by regulations. Work with Units to create inspection schedules. Provide support for Unit self-inspections, when requested.
   5. Facilitate timely correction of identified non-compliances through escalating notification and enforcement.
6. Report issues or raise questions to the appropriate administrative authority so that action can be taken to prevent or correct safety concerns.

7. Pause or stop any activity that is determined to be an illegal or Imminent Hazard situation.

8. Provide support and/or consultation for spills and Environmental releases, including but not limited to: chemical, equipment releases, potentially infectious material, or biohazards.

9. Provide and/or consult on written procedures and training materials for applicable health and safety regulatory standards and facilitate delivery of this information to the University community.

10. Provide professional services to measure and evaluate potentially hazardous conditions on campus.

11. Consult and partner with the Office of General Counsel, as necessary, to assess risks, resolve regulatory findings, and promote the safe implementation of University projects and events.

12. Consult and partner with Facilities Services, Public Safety, and other internal or external entities, as necessary, for University health and safety issues and/or emergency response.

C. Managers and Supervisors

All managers and supervisors, of both academic and non-academic Units, are considered directly responsible for maintaining full compliance with local, state, and federal regulations, as well as University health and safety policies and procedures. Methods to mitigate risks to provide a safe and compliant work environment include:

1. Identify and become familiar with local, state, and federal rules and regulations governing activities within the scope of their Unit’s responsibilities.

2. Identify areas of potential Hazard within the scope of their responsibility. Work with EHSS to implement appropriate safety measures.

3. Educate subordinates of potential Hazards and proper management of risks within their scope of responsibility. This includes coordinating training opportunities and providing appropriate personal protective equipment (PPE).

4. Create a culture that supports the reporting of potential Hazards and ideas for improvement, without fear of retribution.

5. Report unsafe conditions or processes, within the scope of their responsibilities, to EHSS and correct such conditions within their authority and capability to do so. All
unsafe conditions or processes brought to the attention of a supervisor/manager shall be forwarded to EHSS.

6. Stop an operation under their supervision if it poses an Imminent Hazard to people, the Environment, or facilities.

7. Serve as a role model and set a positive example for safety by following established safe work practices and implementing corrective actions brought to their attention.

8. Ensure work areas are regularly inspected to prevent the development of unsafe conditions or processes.

D. All Employees

1. Take personal accountability for their actions and safety conditions on campus, including work and study activities; implement safe practices and comply with all Environmental health, safety, and sustainability rules and procedures established for their work/study areas.

2. Serve as a role model and lead by example to demonstrate that safety and Environmental protection are important facets of all University operations.

3. Identify safety problems and report them immediately to a supervisor, EHSS, and/or Public Safety.

4. Continue to educate and improve safety practices by adopting a questioning attitude when in new working Environments and when working around Hazards.

5. Integrate safety and Environmental management into all University activities.

6. Provide instruction for students and visitors on all applicable safety requirements specific to activity conducted and location.

7. On Campus Injuries: Immediately report to a supervisor/professor, any campus-related incident, including injury or illness and obtain medical treatment, if necessary, without delay.

8. Wear or use prescribed safety equipment.

9. Refrain from operating equipment without proper instruction and authorization.

10. Act to correct safety or regulatory deficiencies when brought to their attention by managers, supervisors, or EHSS.

E. Students

1. Take personal accountability for their actions and safety conditions on campus, including work and study activities; implement safe practices and comply with all
Environmental health, safety, and sustainability rules and procedures established for their work/study areas.

2. Identify safety problems and report them immediately to a supervisor/professor, EHSS, and/or Public Safety.

3. Wear or use prescribed safety equipment.

4. Refrain from operating equipment without proper instruction and authorization.

5. On Campus Injuries: Immediately report to a supervisor/professor, any campus-related incident, including injury or illness and obtain medical treatment, if necessary, without delay.

F. Contractors

1. Identify and become familiar with local, state, and federal rules and regulations governing activities within the scope of their work for ISU.

2. Comply with all local, state, and federal rules and regulations, including this policy

IV. PROCEDURES TO IMPLEMENT

A. Safety Assessments for Units

EHSS utilizes a collaborative approach to assess Hazards and to determine the applicability of various regulations to a Unit’s operations. Units should work with EHSS to identify possible Hazards within the scope of their responsibilities and create a plan to mitigate inherent risks. The scope and breadth of plans will vary from Unit to Unit depending on the activities performed by and risks inherent to the Unit’s operations.

Safety Assessments will involve a review of the following:

1. List of Potential Hazards

   Identify potential Hazards inherent to the Unit’s operations. Possible Hazards to consider include, but are not limited to: protecting employees from job-related injuries and illnesses; preventing accidents and fires; planning for emergencies and emergency medical procedures; identifying and controlling physical, chemical, Environmental, and biological Hazards in the Workplace.

2. Legal Requirements

   Identify local, state, and/or federal regulations governing activities within the scope of the Unit’s operations and mission. Legally required safety procedures, inspection
timetables, and all applicable licensing/regulatory bodies shall be explicitly stated in the plan and communicated to EHSS.

3. Risk Mitigation

Identify methods to mitigate the Unit’s list of potential Hazards. Create procedures to implement within the Unit’s operations to mitigate risk.

4. Communication/Training

Include specific communication mechanisms and training opportunities to ensure employees are aware of and adhering to the Unit’s safety plan.

EHSS will assist supervisors in identifying specialized training required by policies and regulations. Employees are not permitted to perform duties unsupervised until appropriate training has been provided and documented. In some instances only “competent persons” or those “certified” or “qualified” can legally perform certain key tasks. If in doubt about specific job training requirements, supervisors are encouraged to consult with EHSS.

5. Inspection

Include a timetable for inspections required by law and University policy.

B. Training

EHSS facilitates or provides training on various topics. Units are expected to educate employees on the health and safety issues inherent to their scope of operations and communicate any Hazards. Training topics provided to Units will vary depending on the activities performed within individual Units and whether the Unit has training requirements dictated by law or certifications. Training is offered both in person and virtually.

C. Inspections

1. Voluntary Self-Inspections and Consultations

Units are encouraged to periodically perform self-inspections. EHSS conducts consultations and inspections in research, academic, and operational areas.

2. Required Self-Inspections

a. EHSS will communicate with Units that are legally required to perform and document inspections and will periodically review inspection records.

b. EHSS shall conduct inspections and audits to ensure safe operations and compliance with applicable laws and regulations. EHSS also has the authority to assess all buildings and facilities on campus, monitor conditions, and require corrective action.
3. Regulatory Inspections

Some campus Units will experience regulatory inspections conducted by governing agencies. Regulatory inspections can be either planned or unannounced. Inspection schedules are determined by the governing agency and may happen regularly or sporadically in accordance with the policies of said agency. EHSS serves as a liaison between regulatory agencies and campus Units. EHSS is present during required inspections and accompanies agency representatives.

Units subject to regulatory inspections are required to:

a. Immediately contact EHSS if a regulatory agency arrives for inspection without an EHSS representative.

b. Grant inspector(s) access to requested areas, information, and/or documents.

c. Respond to inspector questions in a factual, professional, and respectful manner.

d. Respond to and resolve inspection findings in a timely manner. Units shall immediately resolve findings that can be easily corrected. For instances in which a finding is difficult to resolve in a timely manner, the Unit will coordinate with EHSS to create a corrective action plan.

D. Reporting

It is the responsibility of every employee to report unsafe conditions to their supervisor or the supervisor having responsibility for the area. Supervisors made aware of unresolved or significant hazardous conditions, and Environmental and safety concerns shall report these concerns to EHSS in a timely manner. Reporting is critical so that internal, external, and regulatory notifications can be completed. Timely reporting enables effective incident investigations, prompt corrective actions, and regulatory requirements to be met.

EHSS-related incidents may be reported via phone (208-282-2310), email (ehs@isu.edu) or through the Safety Concern Form located on the EHSS website at isu.edu/ehs.

1. Emergency Reports

Reporting incidents to EHSS is not intended to replace traditional emergency service notifications, which provide immediate incident response. Immediately call 911 and/or Public Safety (208-282-2515) in the event of an emergency. After the appropriate emergency notification is complete, please make a report to EHSS.

2. Non-Emergency Reports

Non-Emergency incidents or hazardous conditions shall be reported to EHSS in a timely manner. Reports may be reported to EHSS via phone (208-282-2310), email
(ehs@isu.edu) or through the Safety Concern Form located on the EHSS website at (isu.edu/ehs). Reports can be submitted directly or anonymously.

3. Anonymous Reports

Idaho State University encourages employees and the campus community to report noncompliance with federal, state, or local laws, or violations of University policy. Reports may be submitted anonymously. In the event of an emergency, reporters should first contact traditional emergency services, then submit an anonymous report. Anonymous reports may be submitted through the following methods:

a. Anonymous reports to EHSS can be made via phone (208-282-2310) or the Safety Concern Form located on the EHSS website (isu.edu/ehs).

b. Anonymous reports can be submitted via the Compliance Reporting website (isu.edu/ogc/compliance) or the hotline at (800) 461-9330. Reports are received by the General Counsel and the Internal Auditor, who review and assist in resolution.

4. The types of hazardous conditions that should be reported include, but are not limited to the following:

a. Releases to the Environment (including sanitary sewer and illicit discharges)

b. Ongoing or unresolved safety concerns

c. Imminent life and fire safety concerns

d. Violations of laws and regulations

5. Reporting Without Fear of Retaliation

Employees are encouraged to seek resolution of hazardous conditions through the EHSS Department. Idaho State University prohibits retaliation against an individual for reporting or participating in resolution of issues related to this policy. Any alleged retaliation should be reported to the Compliance Officer in the Office of General Counsel for investigation.

E. Notifications/Communications

The Environmental Health, Safety, and Sustainability (EHSS) Department shall strive to notify a Department or Unit of a safety concern, regulatory change, or new plan/program within their purview, by either verbal or written communication.

F. Imminent Hazards

The Executive Director of EHSS or their designee has the right and responsibility to pause or stop any activity that is determined to be an Imminent Hazard situation. The activity may
not commence until the concern(s) have been properly addressed and EHSS has lifted the stop order.

Notification will be provided to the Vice President with responsibility for EHSS and the Vice President that oversees the area or functions.

G. Resolution of Safety Findings

EHSS will communicate observed Environment, health, and safety violations, non-compliance items, and deficiencies and may provide suggested corrective actions. Units shall respond promptly to findings with immediate corrective actions or submit plans for addressing items that cannot be corrected immediately. Plans shall include a timeline for resolution, as well as plans for interim corrective measures to mitigate risk until the findings can be fully addressed.

H. Consequences of Violating this Policy

The University may be subject to civil penalties including fines stemming from violations of applicable federal, state, and local laws. University Units in violation of this policy or applicable federal, state, or local laws may be responsible for fines, clean-up, or costs of remediation resulting from violations within their purview. University employees who neglect, disregard, or willfully violate this policy or applicable federal, state, or local laws may be subject to disciplinary action up to and including dismissal. Students who willfully violate this policy may be subject to disciplinary actions through ISUPP 5000 Student Code of Conduct. The University may terminate its relationship with any third-party contractor who violates this policy.

V. RELEVANT LAWS

A. Code of Federal Regulations
B. Idaho Administrative Procedures Act
C. Ex. Order No. 2005-14