POLICIES AND PROCEDURES

Environmental Health and Safety

ISUPP 1070

POLICY INFORMATION
Policy Section: *Governance and Legal*
Policy Title: *Environmental Health and Safety*
Responsible Executive (RE): *Vice President for Operations*
Sponsoring Organization (SO): Department of *Environmental Health, Safety, and Sustainability*
Effective Date: *March 1, 2023*
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Next Review: *March 2028*

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.

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; and
   2. 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, and ensure 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 and the University's Chief Compliance Officer, 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 responsible for promoting compliance with Environmental health and safety regulations, as well as University health and safety policies and procedures.

The scope and breadth of responsibilities will vary from Unit to Unit depending on the activities performed by and risks inherent to the Unit's operations. Units that deal with potential Hazards, including but not limited to: hazardous materials, chemicals, or biohazards; machines with moving parts; high noise levels; activities requiring personal protective equipment; and/or equipment that requires specific training should contact EHSS to discuss ways to mitigate risks inherent in their operations, as necessary.

Methods to mitigate risks to provide a safe and compliant work environment include:

1. Become familiar with Environmental health and safety rules and regulations and requirements 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, as needed.
3. Communicate with employees regarding potential Hazards and proper management of risks within their scope of responsibility.

4. Create a culture that supports the reporting of potential Hazards and ideas for improvement, without fear of retribution. Stop an operation under their supervision if it poses an Imminent Hazard to people, the Environment, or facilities.

D. All Employees and Students

Take personal accountability for their actions, comply with all rules, regulations, and requirements, and identify and report safety problems to a supervisor, EHSS, and/or Public Safety.

E. 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.

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 through the *Safety Concern Form* located on the EHSS website at isu.edu/ehs.

1. 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

2. 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. 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.

F. 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.

G. 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 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. RELATED LAWS, RULES, AND POLICIES

A. Code of Federal Regulations

B. Idaho Administrative Procedures Act

C. Ex. Order No. 2005-14

D. ISUPP 3130 *Disciplinary Action for Non-Classified Staff*

E. ISUPP 3190 *Disciplinary Action for Classified Staff*

F. ISUPP 4039 *Faculty Suspension or Dismissal for Adequate Cause*

G. ISUPP 5000 *Student Code of Conduct*