University of Utah

HEALTH AND SAFETY ROLES AND RESPONSIBILITIES

It is the policy of the University of Utah to provide a safe and healthy environment for all individuals engaged in the work of the University, including faculty, staff, students, and visitors. The University’s health and safety policy is defined in Policy 3-300. The purpose of this document is to clarify the basic roles and responsibilities of individuals and organizations with respect to health and safety in the workplace, consistent with Policy 3-300.

Note that disregarding or neglecting established University of Utah health and safety policies and procedures can result in disciplinary action under appropriate procedures for faculty, staff, or other category of employees.

A. Office of Environmental Health and Safety (EHS)

1. EHS Roles and Responsibilities

Although several University organizations have some role related to health and safety, the Office of Environmental Health and Safety (EHS) is the primary entity responsible for defining University health and safety requirements for the workplace. EHS interprets national, state and local regulations related to occupational and environmental health and safety and provides guidance, support, and compliance inspections for University operations. Specific EHS responsibilities include:

- Provide staff support to safety committees
- Assist in the formulation of health and safety policies
- Develop and assist in implementation of safety programs
- Provide health and safety related technical services
- Monitor the effectiveness of health and safety programs
- Investigate identified health and safety hazards
- Recommend actions to correct health or safety deficiencies
- Facilitate hazardous/radioactive waste disposal
- Develop and manage the University Biosafety program, including
  - Administration of the Institutional Biosafety Committee
  - Maintain the University Biosafety Manual and Exposure Control Plan that include University policies for the handling of hazardous biological materials
  - Submitting reports to the NIH Office of Science Policy related to non-compliance with the NIH Guidelines and safety incidents involving recombinant or synthetic nucleic acids
- Develop and provide health and safety training
  - Identify and prioritize training required to comply with all applicable Occupational Safety and Health Act (OSHA) standards and provide a general definition of who should receive the training.
- Provide training materials, assistance, and programs in safe and healthful work practices.
- Consult with employees and supervisors about health and safety

- Review legislation, recommend policies, and monitor compliance with environmental, health and safety statutes and regulations and University health and safety policies and programs.
- Provide guidance and technical assistance to supervisors and managers in schools, departments, and other work units in identifying, evaluating, and correcting health and safety hazards.
- Develop and manage the university Radiation Safety Program, including:
  - All issues, licenses, and registrations relative to University use of ionizing and non-ionizing radiation
  - Staff support for the Radiation Safety Committee, Nuclear Reactor Safety Committee, and the Radioactive Drug Research Committee
  - Management of radioactive material and radiation producing devices (research, medical, analytical, therapeutic, and industrial)
  - Radiation dosimetry, monitoring and analysis

- Provide University Fire Marshal services
  - Provide fire prevention and consultation services
  - Provide fire extinguisher training to University personnel
  - Represent the University and any of its departments or organizations in interactions with off-campus fire prevention/protection/fighting agencies
  - Serve as the designee for the State Fire Marshal as assigned and appropriate

- Act as the University's official representative with Utah Department of Occupational Safety and Health, U.S. Environmental Protection Agency, U.S. Department of Transportation, U.S. Nuclear Regulatory commission, Utah Department of Waste Management and Radiation Control, and other regulatory agencies on those issues which are associated with environmental health and occupational safety.

2. **EHS Director Delegation of Authority**

The Director of EHS is responsible for the following:

- Managing the university health and safety protection program
- Identifying health and safety protection problems
- Initiating, recommending, and providing corrective actions
- Verifying implementation of corrective actions
- Stopping unsafe activities
- Ensuring compliance with health and safety policies and regulations

The EHS Director is delegated specific authority by the Vice President for Research to meet these responsibilities, including prohibiting the use of hazardous chemicals, biological material, or
radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified by health and safety concerns.

The Director is required to notify university management if individuals do not cooperate and do not address health and safety issues. In addition, the Director is authorized to raise health and safety issues to appropriate regulatory bodies at any time.

B. Employee Health and Safety Roles and Responsibilities

1. All Faculty, Staff, and Students

All faculty, staff, and students of the University have the responsibility to take reasonable care for their own health and safety and for that of others who might be affected by their acts or omissions. Specifically, all employees, staff, and students are expected to:

- Comply with all university, college, and department health and safety policies and procedures
- Wear personal protective equipment as required
- Complete all health and safety training as assigned
- Perform activities as trained
- Immediately **STOP WORK** if conditions or operations are felt to be unsafe. Contact your supervisor and/or EHS to evaluate the situation and reauthorize the work.
- Promptly report unsafe conditions, environmental health hazards, and injuries and illnesses to their supervisor, program director, or local safety committee

2. College Deans and Department Heads

College Deans and Department Heads are expected to:

- Ensure that facilities and equipment provided meet requirements for a safe work environment and activities being conducted or modified are in compliance with applicable rules, regulations and standards.
- Ensure individuals under their management have the authority and support to implement health and safety policies, practices and programs.
- Ensure areas under their management are in compliance with University, local, state and national environmental health and safety policies, practices and programs.
- Establish priorities and commit resources for correction of safety deficiencies.
- Establish procedures for dissemination of policies and other safety-related information.
- Establish procedures for implementation of policies.
- Establish a system for assessing safety performance.
• Immediately notify Environmental Health and Safety when they become aware of a violation of any University, local, state or national environmental health or occupational safety rule or regulation. This includes any contact with the local, state, and federal regulatory agencies.

3. Supervisors

All supervisors are expected to:

• Provide a safe and healthy environment for those areas and personnel for whom they have supervisory responsibility
• Understand all health and safety requirements applicable to their specific workplace and operations, including incident and accident reporting requirements
• Initiate and enforce necessary preventive measures to control hazards
• Ensure necessary support, such as personal protective equipment, occupational medical examinations, administrative and engineering controls, etc. are in place for their personnel
• Ensure personnel under their supervision have completed all applicable and appropriate training
• Incorporate health and safety considerations in work planning, staff meetings, and performance evaluations
• Participate in investigations of incidents and injuries occurring in areas under their supervision
• Serve as the focal point for safety and health concerns in their unit
• Immediately notify Environmental Health and Safety when they become aware of a violation of any University, local, state, or federal environmental health or occupational safety rule or regulations.
• Immediately notify Environmental Health and Safety if contacted by local, state or federal occupational, environmental, or other regulatory agencies.

4. Department Chairs

Department Chairs have the same responsibilities as first-line supervisors for the personnel for whom they have supervisory or administrative responsibility (see above).

5. Principal Investigator (PI)/Lead Researcher Responsibilities

Principal Investigators (PIs), lead researchers, and laboratory managers have the same responsibilities as first-line supervisors for the personnel for whom they have supervisory or administrative responsibility (see above). However, the unique and significant hazards often present in research laboratories can result in adverse consequences beyond the typical workplace environment. Therefore, particular attention is paid to laboratory health and safety responsibilities.

To expand upon the supervisory responsibilities listed above, PIs, lead researchers, and laboratory managers are expected to:
- Conduct a risk assessment to ensure that all hazardous materials and conditions are recognized and mitigated to the extent possible.
- Provide a safe and healthy environment by ensuring that their laboratory or field site has a robust and comprehensive safety program customized to the specifics hazards of the laboratory or site (including, but not limited to chemical, biological, radiation, electrical, nuclear, and physical hazards).
- Abide by University of Utah policies for working with hazardous materials.
- Develop and maintain written standard operating procedures (SOPs) for laboratory processes, including hazard analyses and required hazard controls.
- Provide personal protective equipment (PPE) to all personnel that is appropriate for the work conducted, ensuring that PPE is worn and provide instruction on donning and doffing of PPE.
- Act as or designate a Lab Safety Officer/Chemical Hygiene Officer for their group with specific authority to enforce safety requirements within the laboratory.
- Conduct regular laboratory safety self-inspections at least annually or as assigned by EHS.
- Support College and Departmental safety committees and help evaluate and improve safety in peer laboratories.
- Create a training program specific to their laboratory hazards or field work and ensure personnel under their supervision have completed all applicable and appropriate training.

Note that individual PIs have been found to be criminally liable for accidents occurring in University laboratory settings.

6. Course Instructors

Course Instructors have the same responsibilities as first-line supervisors for the students for whom they have supervisory or administrative responsibility. Instructors of laboratory or field courses are responsible for:

- Evaluating hazards and controls
- Selecting and providing appropriate safety training for all students and staff
- Documenting completion of training
- Ensuring that necessary personal protective equipment and other hazard controls are available and in use