Written Workplace Safety Program

I. PURPOSE

The purpose of the College of Southern Nevada (CSN) Written Workplace Safety Program is to outline practices which are fundamental to creating and maintaining a safe and healthy working environment.

CSN is committed to the personal safety, health, and wellbeing of all members of the College community. It is the intention of CSN that all employees, students, and visitors work and learn in an environment devoid, to the fullest extent feasible, of safety and health hazards.

II. SCOPE

This procedure is intended for CSN employees, including faculty, staff, and student employees at all sites owned and operated by CSN.

III. PROCEDURE

A. Responsibilities:

1. College of Southern Nevada President
   - Promote a safe and healthy culture throughout CSN.
   - Ensure safety and health programs are effectively implemented.
   - Ensure that the needed financial, material and personnel resources are provided to achieve the goals and objectives of the health and safety program.

2. CSN Environmental Health and Safety (EHS)
   - Manage CSN compliance with all applicable federal, state, and local health and safety requirements.
   - Provide training resources for all employees in appropriate occupational health and safety areas.
   - Recommend health and safety policies and procedures and review them for continuous improvement.
   - Review accident and illness reports and conduct related investigations.
   - Promote health and safety and serve as a technical resource to the campus community.

3. Managers and Supervisors
   - Ensure effective implementation of safety programs within their areas of responsibilities.
   - Ensure employees have a means to report any safety concern and can do so without fear of reprisal.
   - Inspect work areas to ensure that hazards are promptly identified and addressed.
   - Ensure that employees are provided with and use appropriate safety devices, safeguards, personal protective equipment (PPE), and tools needed to safely perform their assigned tasks.
   - Allocate appropriate time for employees to complete safety training courses.
   - Report and investigate injury and illnesses and property damage accidents.
   - Ensure that the College’s discipline policy is fairly administered.
4. Employees
   - Follow all applicable safety programs and procedures for their respective areas.
   - Complete assigned safety training courses in a timely manner.
   - Immediately report any unsafe and/or unhealthful conditions observed and/or experienced in the workplace to their supervisor and/or CSN’s Office of Environmental Health & Safety.
   - Inspect all tools and equipment prior to use to identify any hazards.
   - Properly use personal protective equipment (PPE) provided.
   - Report any injuries, illnesses, or incidents to the appropriate person.

5. Students
   - Follow all applicable safety programs and procedures that pertain to their course of study, research, and/or laboratory projects.

6. CSN Safety & Security Committee
   - Promote health, safety, and responsible environmental practices.
   - Encourage communication between employees and administration.
   - Serve in an advisory role to the President on issues related to safety, health, security, and the environment.
   - Make recommendations to the administration whenever appropriate to maintain and enhance campus safety and environments.

B. Hazard Identification, Analysis & Control

1. In order to maintain a safe and healthy educational and work environment, all must be vigilant in efforts to identify, analyze and control any existing or potential hazards on all campuses.

2. Before hazards can be addressed, they first must be identified and analyzed. This can be accomplished through one or more of the following means:
   - Employee observations
     - Members of the college community are encouraged to report potential or existing hazardous conditions to their supervisor or directly to the office of Environmental Health and Safety.
   - Inspections
     - Supervisors and employees are responsible for conducting informal daily inspections of their work areas.
     - EHS shall conduct facility inspections on all campuses at least annually.
   - Job Safety Analysis or Job Descriptions
     - Job analyses can be used to identify areas for potential injury or illness. Every attempt will be made to alleviate the potential danger proactively.
   - Accident/Injury reports and/or investigations
     - Reports following accidents, incidents, and injuries shall be reviewed by EHS to determine areas and issues to be addressed and to prevent reoccurrence.
   - Exposure Monitoring
     - Monitoring for conditions in the work environment (e.g., indoor air or water quality) may identify situations that require remediation.
   - Safety & Security Committee Recommendations
     - Provide written recommendations for safety/health improvements, changes, and response.
   - Outside Agency Visits
     - Regulatory agencies, accrediting bodies, consultants, etc.
3. Once hazards have been identified and analyzed, corrective actions will be identified and implemented to eliminate or minimize them. Hazards shall be given a priority based on their relative severity. Hazards will be addressed using the hierarchy of controls as follows:
   - Any hazard which can be eliminated shall be, to the fullest extent feasible.
   - All hazards shall be controlled by use of engineering or administrative controls.
   - Personal Protective Equipment (PPE) shall be used as appropriate.
   - A combination of these may be implemented as appropriate.

4. Supervisors and managers are responsible for correcting the hazards within their control. All other hazards will be evaluated, and controls implemented by the appropriate representative (in most cases EHS, Facilities Management, and/or the CSN Safety & Security Committee).

5. Identified hazards that cannot be immediately corrected will be documented in writing with interim means of protection if required. The status of corrective actions will be tracked by the area manager and EHS until completion.

6. When a hazard is found to be an imminent threat to life, health, or property, the worksite supervisor, manager, or EHS shall take immediate action to stop work and remove personnel from the danger.

7. Administrative or work practice controls for hazards will either be designated in a separate safety program or part of a safety procedures. The following controls for hazards can be found in separate programs and/or procedures:
   - Chemical hazards: see Hazard Communication Plan, Laboratory Safety Manual, and Chemical Hygiene Plan
   - Fire, bomb threat, earthquake events: see Emergency Action Plan
   - Bloodborne pathogens exposure: see Bloodborne Pathogen Program
   - Confined Space: see Confined Space Entry Program
   - Welding, cutting, brazing hazards: see Hot Work Program

C. Safety and Health Training

1. Training is a crucial element in having an effective health and safety program. A well-trained employee will be a much safer employee.

2. EHS is responsible for the development, implementation and evaluation of health and safety education and training programs. EHS works in conjunction with employee supervisors and Human Resources to determine specific training needs and requirements for specific job positions. This is referred to as a training needs assessment. The training needs assessment helps EHS to identify individuals who may need special training in areas such as asbestos awareness, bloodborne pathogens, or other subjects necessary to perform specific tasks and job requirements.

3. Some training will be conducted in-house, while other requiring special expertise or special delivery methods may be contracted to an outside source. EHS works with the Center for Academic and Professional Excellence (CAPE) to coordinate safety training delivery to CSN employees and records training attendance. CSN Department of Workforce and Economic Development may also assist in providing appropriate training sources.

4. Outlines of specific safety training programs will be approved by the Director of EHS to ensure the programs cover all required topics and that the training is conducted in a professional and consistent manner.

5. Employees should receive safety training under the following circumstances:
   - At new hire orientation sessions
• Before assignments to hazardous tasks
• When processes, procedures, equipment, or materials are significantly changed
• When employee performance/behaviors indicate additional training is needed

6. Supervisors are responsible for ensuring employees receive on-the-job training specific to their work area and work tasks to include safety practices and PPE use.

7. Safety and Health training records shall be maintained by HR/CAPE, EHS, and/or the department for a minimum of three years.

D. Incident Reporting, Investigation, and Corrective Action

1. When accidents, injuries or incidents occur, it is imperative that they be reported to the appropriate entity and investigated. A proper investigation provides for the sharing of lessons learned and preventing reoccurrence.

2. EHS conducts investigations of incidents. Common notification methods include injury report forms, communications with University Police Services, Facilities work order requests, and other individual or departmental reports.

3. Please refer to the CSN Incident Reporting and Investigation Procedure and the EHS Incident Reporting Website for detailed guidance on reporting and investigating incidents such as:
   • Criminal Activity
   • Facility Issues
   • Near Misses and Safety Concerns
   • Chemical Spills or Releases
   • Student Injury, Illness or Exposure
   • Employee Workplace Injury, Illness or Exposure
   • Visitor Injury, Illness, or Exposure

4. After an investigation, EHS and/or the department will identify corrective actions (if required) as well as those responsible for implementing the action. EHS will follow-up with departments to ensure corrective actions have been completed.

E. CSN Safety & Security Committee

1. The Safety & Security Committee acts in an advisory role to the College President in all manners pertaining to monitoring, improving, and maintaining a safe and secure campus environment.

2. The committee is comprised of representatives from across the college community to include University Police Services, Environmental Health and Safety, Nevada Faculty Alliance, Administrative Faculty Assembly, Classified Council, School of Applied Technology, School of Arts & Letters, School of Business, Hospitality, and Public Service, School of Education, Behavioral & Social Sciences, School of Health Sciences, School of Science & Mathematics, The Office of the President, Finance & Administration, Student Affairs, and Campus Provost representatives.

3. The committee meets on a regular basis and receives and evaluates safety and security concerns affecting CSN and recommends appropriate corrective or preventive actions to the President. The committee also fosters cooperative communication between students, staff, and leadership to maintain a safe and healthy learning and working environment.

4. For detailed information on the committee’s charge, responsibilities, and meeting requirements, refer to the CSN Safety & Security Committee By-Laws.
F. Workplace Safety Compliance

1. Employees are required to comply with all OSHA safety and health standards that apply.

2. Supervisors are responsible for administering safety procedures and standards to his/her subordinates and shall contact EHS for additional technical assistance or remedial training, if appropriate.

3. In general, frontline supervisors in coordination with Human Resources shall be responsible for administering disciplinary action for employees deemed responsible for safety violations up to and including dismissal per the Nevada Administrative Code (NAC) when warranted.

4. If EHS observes an employee performing a task or behaving in a manner that could result in immediate injury or illness, the unsafe behavior will be immediately addressed with the individual. The Director of EHS will meet with the employee’s supervisor to plan additional training and/or remediation.

IV. AUTHORTIY AND CROSS REFERENCE LINKS

Nevada Administrative Code 618.540 Requirements of Written Safety Program
Nevada Revised Statute 618.383 Establishment of a Safety Program