INJURY AND ILLNESS PREVENTION PROGRAM

1. Purpose:

a. The purpose of this document is to establish procedures for the development and implementation of an effective written injury and illness prevention program for the University of Nebraska at Omaha (UNO), which promotes occupational safety and health practices and strives to reduce work-related accidents and injuries throughout the institution.

b. The Safety Policy of the University of Nebraska states:

"The Board of Regents of the University of Nebraska recognizes its role of stewardship in protecting and conserving the human, property, and financial resources of the University. Each employee of the University must also recognize this commitment and practice the highest degree of concern for the safety of fellow employees, students, patients, and the general public. It is the policy of the Board of Regents to promote safety at all times and to prevent occupational injury, illness, and financial loss to the institution.

The personal safety and health of each employee of the University of Nebraska is of primary importance. Prevention of occupationally induced injuries and illnesses is of such importance that high priority will be given to supporting and funding programs and/or projects that prevent occupational injury and illness. To the greatest degree possible, management will provide all equipment and instruction on safety practices required for personal safety and health, in keeping with applicable standards.

The Vice President for Business and Finance will establish guidelines for implementation of this policy. The responsibility for implementation of the safety program on each University campus is assigned to the Chancellor or designee. This includes the development and maintenance of an effective written injury and illness prevention plan as required by the Nebraska Workplace Safety Consultation Program and the establishment of a campus safety committee."

Reference: University of Nebraska Board of Regents Policies, RP-6.3.5 General Policy for University Injury and Illness Prevention Program
2. Responsibility

The Vice President for Business and Finance shall ensure that the University injury and illness prevention program is in compliance with the Nebraska statutes and the rules and regulations promulgated by the State of Nebraska Commissioner of Labor.

a. Chancellor:
   i. The Chancellor is responsible for the implementation of UNO’s Safety Policy and Injury and Illness Prevention Program at all campus locations.

b. Vice Chancellors:
   i. Vice Chancellors are responsible for the implementation of UNO’s Safety Policy and Injury and Illness Prevention Program at all campus locations under their auspices.
   ii. They are also responsible for providing resources necessary to support safety programs.

c. Deans, Department Chairs, Directors:
   i. Deans, Chairs, and Directors are responsible for establishing and maintaining safety programs in their areas, which provide a safe and healthy work environment.
   ii. They are responsible for ensuring adequate funding is available to support safety programs.

d. Principal Investigators (PI), Supervisors, Managers:
   i. PI’s, supervisors, and managers are responsible for compliance with this plan.
   ii. They must ensure workplaces and laboratory equipment are safe, adequate personnel protective equipment (PPE) is available and appropriately used.
   iii. They will correct any safety deficiencies.
   iv. They will ensure that students, employees, and any visitors under their supervision, have been adequately trained and adhere to campus safety policies, plans, and guidelines.

e. Faculty, Staff, and Students:
   i. Faculty, staff, and students are responsible for keeping themselves informed of all safety policies, plans, and guidelines.
   ii. They must participate in safety training and equipment orientation.
   iii. They must adhere to health and safety practices prescribed by Environmental Health and Safety (EHS) and their supervisors and must report any unsafe condition immediately upon discovery.

f. Environmental Health & Safety (EHS):
   i. Must review government regulations to ensure policy, plans, and guidelines are compliant and current with best practices.
   ii. EHS is responsible for creating and implementing biological, radiological, chemical, and safety programs for campus-wide implementation.
   iii. EHS will provide safety and emergency preparedness training materials to the entire campus community.
   iv. EHS will assist in providing appropriate training materials to supervisors and managers for dissemination for their respective personnel.
3. Applicability

The provisions contained within this program apply to all UNO Leadership, Faculty, Staff, and Students. This Injury and Illness Prevention Program, when followed, will ensure that UNO is in compliance with the Nebraska statutes and the rules and regulations promulgated by the State of Nebraska Commissioner of Labor.

4. UNO Injury and Illness Prevention Program

This program includes the following:

a. Chancellor’s Policy Statement:

“The overriding culture at UNO must be a culture of absolute safety. We need to assure a culture of safety against which we must perform ALL our work. A culture of safety recognizes that to err is human and establishes systems with procedures and protocols that do everything possible so that human error does not ever result in human harm. We all need to be part of the culture of safety to make it succeed. A culture of safety encourages reporting of actual and potential situations which may place staff and others at risk, openly assesses those risks, and implements redundant systems to keep risk to the absolute minimum.”

Jeffrey P. Gold, MD, UNO Chancellor March 20, 2020

b. Safety Coordinators

1. The Vice Chancellor for Business, Finance, and Business Development shall ensure that the Safety Leadership Team implements an injury and illness prevention program that complies with state statutes and the rules and regulations promulgated by the state commissioner of labor. The Safety Leadership Team and the UNO Safety Committee will annually review the effectiveness of the UNO injury and illness prevention program and update it as needed.

2. The Director of EHS (or designee) is responsible for the development and administration of the injury and illness prevention program and represents UNO at university safety and health symposiums and other related activities.

c. UNO Safety Committees

The purpose of Safety Committees is to promote a safe working environment with employee involvement. The committees give employees a direct voice in addressing safety concerns throughout the campuses. They have several duties: communication and dissemination of information, fielding employee concerns, assisting in the investigation of accidents and concerns, and discovery of new or improved methods for providing a safe workplace.
i. Safety Leadership Team: The Chancellor has established a Safety Leadership Team to ensure compliance with legislation, protection of assets, and to address employee safety issues and concerns. The Safety Leadership Team will review EHS safety programs and consider recommendations from the Campus Safety Committee. It will assist in identifying priorities and securing funds to complete recommendations.

ii. UNO Safety Committee: This Committee is composed of equal representatives from faculty, staff, and campus administration, including EHS staff. All UNO employees are eligible to serve as members of the Committee. Administrative representatives will comprise no more than half of committee membership.

The committees meet at least quarterly and maintain written minutes of its meetings. The committees may review all significant workplace injuries or illnesses. The Safety Leadership Team and Safety Committee structure and membership lists are listed online Safety Committees.

Examples of other safety committees on campus include the Institutional Biosafety Committee, Radiation Safety Committee and Chemical Safety Committee, Institutional Review Board, Institutional Animal Care and Use Committee

d. Safety Training

A comprehensive safety training program that covers the injury and illness prevention plan, safety policies, procedures, and guidelines is to be established and maintained by UNO EHS, which provides:

i. All new employees, within 30 days of employment, are required to take Safety and Emergency Preparedness Training. This training is required for all employees annually after that.

ii. Faculty, staff, and students, depending on the type of work they are doing, are required to take more specific training in the areas of Chemical, Biological, Radiological, and General Safety.

Also, each Department/Supervisor shall provide training for

iii. Job-specific procedures for new employees

iv. Job-specific training for employees before they perform hazardous work

e. Safety Rules, Policies, and Procedures

Safety policies, procedures, and guidelines are available on the EHS website and were developed and communicated in a manner to be easily understood by all employees (includes temporary and contract employees) and students. Upon request, EHS will initiate special efforts for non-English speaking individuals.
f. Incident Reporting
   Faculty, staff, and students must report all incidents or concerns to
   unomaha.edu/report-a-concern/index.php. Submit an Injury Report for all
   accidents/incidents resulting in injury or potential injury to EHS and Human
   Resources as directed on the bottom of the form. The immediate supervisor,
   department manager having jurisdiction over the area, and/or EHS will
   investigate work-related accidents. The Safety Leadership Team and Safety
   Committee may review accident and investigation reports. Any work-related
   incident resulting in employee in-patient hospitalization or fatality must be
   reported immediately to the Director of EHS. Submit all unsafe conditions or
   "Near-Miss" incidents that did not result in injury using the Report an
   Incident or Concern Form.

g. Imminent Danger
   An imminent hazard is any hazard that could cause serious injury or death
   if left uncorrected. Any employee discovering an imminent hazard that
   cannot be immediately corrected shall report the hazard immediately to
   the Director of Environmental Health and Safety via Public Safety
   Dispatch at 402.554.2911. The goal is to identify, control, and eliminate
   imminent hazards from the workplace.

h. Record Keeping
   Human resources will keep all accident reports, summaries of
   investigations, work-related injury, and work-related illness records and will
   send a copy to EHS. EHS will also keep all incident reports that don't result
   in injury or illness (i.e., spill reports) and near-miss reports. The employee's
   home department shall maintain training records. EHS and the UNO
   Compliance Office also track some training. Records will be retained per
   the University of Nebraska Board of Regent's records retention and
disposition schedule and UNO's retention and destruction/disposal of
regulated information policy.

i. Worksite Inspections
   EHS will conduct routine inspections to identify hazards. All employees are
   responsible for reporting any safety hazards which they have discovered to
   their immediate supervisors or EHS. The deficiencies noted will be tracked
to completion. EHS will share these deficiencies with the Safety Leadership
   Teams and Campus Safety Committees, and they may make
recommendations on accident prevention measures. PI's and their
   Departments are responsible for correcting any deficiencies.

j. Statement of Authority
   The Vice Chancellor for Business, Finance and Business Development
   and Director of Environmental Health and Safety or their designees
   have the authority to take immediate corrective action whenever a
   hazardous condition exists, which could result in personal injury or
death to any individual or substantial damage to university property.

k. Reporting Suspected University-Related Misconduct and Prohibition Against Retaliation (Whistleblower Policy) RP-1.1.3
The general purpose of this policy is to protect any University of Nebraska student, employee, or another member of the University community who makes a good-faith disclosure of suspected University-related misconduct.

University of Nebraska Board of Regents Policy RP-1.1.3