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 Medical Center (UNMC), 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 UNMC'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 UNMC'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 responsible for compliance with this plan.
   ii. They must ensure workplaces and laboratory equipment is 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 UNMC Leadership, Faculty, Staff, and Students. This Injury and Illness Prevention Program, when followed, will ensure that UNMC is in compliance with the Nebraska statutes and the rules and regulations promulgated by the State of Nebraska Commissioner of Labor.

4. UNMC Injury and Illness Prevention Program

This program includes the following:

a. Chancellor's Policy Statement: (UNMC Safety Policy)
   "The overriding culture at UNMC 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, UNMC Chancellor July 18, 2014

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 UNMC Employee Safety Committee will annually review the effectiveness of the UNMC 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 UNMC at university safety and health symposiums and other related activities.

c. 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.
UNMC Safety Committees

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. UNMC Employee Safety Committee: This Committee is composed of equal representatives from faculty, staff, and campus administration, including EHS staff. All UNMC 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 Employee 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 were established and maintained by UNMC 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 work-related incidents/accidents/near-misses [https://www.unmc.edu/ehs/safety/incident-reporting.html](https://www.unmc.edu/ehs/safety/incident-reporting.html). Submit an Incident Report for all accidents/incidents resulting in injury or potential injury to Human Resources. The immediate supervisor, department manager having jurisdiction over the area, and/or EHS will investigate work-related accidents. The Safety Leadership Team and Employee 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 to EHS using the Near Miss/Potential Hazard 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 Security Dispatch at 402-559-5555. 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 UNMC Compliance Office also track some training. Records will be retained per the University of Nebraska Board of Regent's record retention policy and UNMC's record retention 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 and Finance 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. Whistleblower Policy
The general purpose of this policy is to protect any University of Nebraska Medical Center (UNMC) student, employee, or another member of the University community who makes a good-faith disclosure of suspected University-related misconduct. [UNMC Whistleblower Policy](https://www.unmc.edu/psla/whistleblowerpolicy.html)