



**SAFETY PROGRAM MANUAL**  
**INJURY & ILLNESS PREVENTION PROGRAM**

Revision 09/01/2023

## Purpose:

To maintain a safe and healthful work environment, Bentley University has developed this Injury and Illness Prevention Program for all employees. This document describes the goals, statutory authority, and responsibilities of all employees and students under the Program. It addresses Compliance, Hazard Identification, Accident Investigation, Hazard Mitigation, Training, Communication, and Program Documentation. By making employee safety a priority for every Bentley employee, we can reduce injuries and illnesses, increase productivity, and promote a safer and healthier environment for all individuals at Bentley University.

## Goals:

Diligent implementation of this program will reap many benefits for Bentley University. Most notably it will:

- Protect the health and safety of employees. Decrease the potential risk of disease, illness, injury, and harmful exposures to Bentley personnel.
- Reduce workers' compensation claims and costs.
- Improve efficiency by reducing the time spent replacing or reassigning injured employees, as well as reducing the need to find and train replacement employees.
- Improve employee morale and efficiency as employees see that their safety is important.
- Minimize the potential for penalties assessed by various enforcement agencies by maintaining compliance with Health and Safety Codes.

## Responsibility:

The ultimate responsibility for establishing and maintaining effective environmental health and safety policies specific to campus facilities and operations rests with the president of the University and the supporting staff. General policies that govern the activities and responsibilities of the Environmental Health and Safety program are established under his final authority.

Responsibilities for Injury and Illness prevention at Bentley University are as follows:

*Department (Department Head):*

- Maintains a place of employment that is safe and healthy.
- Provides and enforces the use of safety devices, personal protective equipment, and safeguards.
- Adopts and uses methods and processes reasonably adequate to assure work performed and place of employment are safe.
- Takes every reasonable precaution to protect the life and safety of employees.
- Provides workers' Compensation Manager with timely fashion information as needed and assistance to meet legal and University requirements for claims management.
- Maintains communications with work-injured employees and cooperates with efforts to return employees to productive employment.

*Supervisors:*

- Encourages the proper attitude toward job safety performance in themselves and their subordinates.
- Trains employees in job safety and health practices.
- Reports work-related injuries and illnesses by University procedures and State law.
- Investigate every accident and report of injury promptly and thoroughly to determine the cause and prevent recurrence.
- Requires all employees to comply with Occupational and Health standards and all rules, regulations, and orders applicable to their actions and conduct.

*Employee:*

- Complies with all Occupational Safety and Health Standards and rules, regulations, and orders that apply to their actions and conduct.
- Takes every reasonable precaution to protect the health and life of other employees.
- Does not remove, displace, damage, destroy, or carry off safety devices, notice, or warning furnished for use in any place of employment or interfere in any way with the use thereof by any other person.

- Reports work-related injuries and illnesses promptly to their supervisor and cooperates with University efforts to provide timely, fair, and equitable benefits under State law and University procedures.

Additional responsibilities under this Injury and Illness Prevention Program are:

*The Life Safety Service Department is responsible for:*

- Assisting departments in their management of this Injury and Illness Prevention Program.
- Providing consultations to Bentley University on matters of health and safety.
- Monitoring and advising personnel using radiation, carcinogens, and other hazardous materials.
- Interpreting external regulations and recommending appropriate compliance strategies.
- Providing Job safety analysis for current and new positions.
- Provide specialized training as needed for specific work.
- Investigate every accident and report of injury promptly and thoroughly to determine the cause and prevent recurrence.

## **Compliance**

Employee compliance will be reinforced by one or more of the following:

- Appropriate comments on performance evaluations.
- Recognition at safety meetings.
- Written commendation or letters of recognition.

## **Hazard Identification**

A health and safety inspection program is essential to reduce unsafe conditions which may expose staff, faculty students, and visitors to incidents that could result in personal injuries or property damage. It is the responsibility of each department to ensure that appropriate, systematic safety inspections are conducted periodically.

## **Scheduled Safety Inspections**

Upon initial implementation of this Program, inspections of all work areas will be conducted. All inspections will be documented with appropriate abatement of any hazards detected. Thereafter, safety inspections will be conducted at the frequency described below:

- Annual inspections of all office areas will be conducted to detect and eliminate any hazardous conditions that may exist.
- Semi-annual inspections of all potentially hazardous areas (shops, stores, docks, etc.,) will be conducted to detect and eliminate any hazardous condition that may exist.
- Semi-annual inspection of all laboratories will be conducted to detect and eliminate any hazardous conditions that may exist. In addition, all guidelines in the Chemical Hygiene plan will be followed.

## **Unscheduled Safety Inspections:**

- Additional safety inspections will be conducted whenever new equipment or changes in procedures are introduced into the workplace that present new hazards.
- Life Safety Services may conduct periodic unscheduled safety inspections of all potentially hazardous areas to assist in the maintenance of a safe and healthful workplace.
- Safety review will be conducted when occupational accidents occur to identify and correct hazards that may have contributed to the accident.

Staff at the Life Safety Services Department are available for consultation and assistance in conducting these various hazard assessments by calling x3448.

## **Accident Investigation**

With assistance from Life Safety Services, supervisors will investigate all reported accidents, injuries, occupational illnesses, and near-miss incidents to identify the causal factors or attendant hazards. Appropriate repairs or procedural changes will be implemented promptly to mitigate the hazards implicated in these events.

Serious occupational injuries, illnesses, or exposures to hazardous substances, as defined by OSHA, must be reported to Life Safety Services no later than 24 hours. Life Safety Services will contact OSHA as necessary. An accident investigation will be conducted by Life Safety Services in conjunction with a representative from the injured employee's department.

## **Hazard Mitigation**

All hazards identified will be promptly investigated and alternate procedures implemented as indicated. The University recognizes that hazards range from imminent dangers to hazards of

relatively low risk. Corrective actions or plans, including suitable timetables for completion, are the responsibility of the department. Life Safety Services consultation is available to determine appropriate abatement action.

For serious hazards that present an imminent danger to life or limb, immediate action will be taken to mitigate the hazard. The department head, Life Safety Services, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

If continued use of the area or equipment must be maintained, then affected personnel will be provided with the proper training, protective equipment, or other safeguards deemed necessary to protect them from the hazard. Serious, concealed dangers will be reported to the safety services at extension 3448. If the serious concealed danger cannot be abated within 15 days, then it will also be made known to all affected employees in writing. Staff in the Life Safety Services Department are available for consultation and assistance on matters involving hazard mitigation and for deciding what constitutes a “serious concealed danger.” All external reporting requirements will be directed through Life Safety.

## **Training**

Effective dissemination of safety information lies at the very heart of a successful Injury and Illness Prevention Program. All employees must be trained in general safe work practices. In addition, specific instructions concerning hazards unique to each employee’s job assignment will be provided.

### *General Safe Work Practices*

At a minimum, all employees will be trained in the following:

- Fire safety, evacuation, and emergency procedures.
- Disaster Response
- Safe Lifting and Back Injury Prevention (if applicable)
- Hazard Communication

### *Specific Safe Work Practices*

In addition to this general training, each employee will be instructed how to protect themselves from the hazards specific to their job duties. At a minimum, this entails how to use workplace equipment, safe handling of hazardous materials, and use of personal protective equipment whenever new hazards or changes in procedures are implemented.

Managers are responsible for providing supervisors with the training necessary to familiarize themselves with the safety and health hazards their employees are exposed to. It is the responsibility of each supervisor to know the hazards related to their employee's job tasks and ensure they receive appropriate training. Also:

- Supervisors will ensure that all employees receive general and job-specific training before initial or new job assignments.
- Supervisors will ensure that employees are trained whenever new substances, processes, procedures, or equipment are introduced to the workplace which may create new hazards.
- Training must also be given when new or previously unrecognized hazards are brought to a supervisor's attention.
- All training will be documented and kept in department files.

### **Communication**

Effective two-way communication which involves employee input on matters of workplace safety is essential to maintaining an effective Injury and Illness Prevention Program. To foster better safety communication, the following guidelines will be implemented:

- Managers and supervisors will provide time at periodic staff meetings to discuss safety topics. Stats reports will be given on safety inspections, hazard mitigation projects, and accident investigation results, as well as feedback on previous employee suggestions. Employees will be encouraged to participate and give suggestions without fear of reprisal.
- At the discretion of the department head, additional communication methods may be used and may include posters, meetings, bulletins, manuals, Code of Safety Practices, or standard operating procedures.
- Employees are encouraged to bring to the University's attention any potential health or safety hazard that may exist in the work area. A mechanism for anonymous employee input, such as a suggestion box or mail station for safety suggestions, hazard identification, and complaints, sent directly to Life Safety for follow-up. The individual may include their name on this form or it may be sent anonymously.
- Supervisors will follow up on all suggestions and investigate the concerns brought up through these communication methods, utilizing Life Safety assistance if needed. Feedback to the employees is critical and must be provided for effective two-way communication.
- The department will pursue readily understandable health and safety communications for dissemination.

## **Documentation**

Many standards and regulations of OSHA contain requirements for the maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure, monitoring, inspections, and other activities relevant to occupational health and safety. To comply with these regulations, as well as to demonstrate that the critical elements of this Injury and Illness Prevention Program are being implemented, the following records will be kept on file in the department for at least the length of time indicated below:

- Copies of all Safety Inspection Forms: retain 5 years.
- Copies of all Hazard Identification Forms: retain 5 years.
- Copies of all Accident Investigation Forms: retain 5 years.
- Copies of all Employee Training checklists and related Training Documents: retain them for the duration of each individual's employment.
- Copies of all Safety Postings and Safety Meeting Agendas: retain 5 years.
- Copies of Employee Exposure Records, or other required Employee Medical Records: retain 30 years or the duration of each individual's employment if >30 years.

The department will ensure that these records are kept in their files and present them to OSHA or other regulatory agency representatives if requested. A review of these records may be conducted by Life Safety during routine inspections to measure compliance with the program.

A safe and healthy workplace must be the goal of everyone at Bentley University with responsibility shared by management and staff alike. If you have any questions regarding this Injury and Illness Prevention Program, please contact the Life Safety Department at 781-891-3448.