



1. INTRODUCTION

At the University of Notre Dame, safety is everyone’s responsibility. All members of the university community should be thoroughly familiar with their safety responsibilities, strive to follow safety practices at all times, act proactively to prevent accidents and injuries, communicate hazards to supervisors, and be prepared for emergencies that may occur in the workplace or on campus.

This Health and Safety Policy reaffirms the university’s strong commitment to safety and establishes a uniform system and process (the Integrated Safety Plan) to help individuals, departments and units meet their health and safety responsibilities.

This policy outlines safety responsibilities and training requirements to ensure individual and institutional compliance with relevant environmental health and safety laws, regulations, policies and guidelines.

Risk Management and Safety staff will work closely with department safety representatives, safety committees, employees and students throughout the university to communicate and address safety issues and needs and to facilitate compliance with this policy.

2. POLICY STATEMENT

The University of Notre Dame strives to maintain a safe living, learning, and working environment for all its constituents. Faculty, staff, students, and other members of the Notre Dame community must conduct university operations in compliance with applicable federal, state, and local laws and regulations and other university health and safety standards.

3. SCOPE

This policy applies to all departments of the university and all members of the Notre Dame community.

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5. DEFINITIONS

Biohazardous Agent	A microorganism (bacteria, viruses, fungi, etc.) capable of causing illness or disease.
Department Safety Coordinator (DSC)	An individual who is authorized to ensure that his or her department/unit or building has an active safety program in place and serves as the primary liaison between the department/unit or building and Risk Management and Safety (RMS) for all safety matters including safety program development and maintenance.
Hazardous Chemical	An element, compound or mixture that poses a potential health hazard to humans or the environment (e.g., poison, carcinogen, mutagen, asphyxiant, sensitizer, oxidizer, corrosive, explosive, flammable).
High Hazard Chemical	An element, compound or mixture that is acutely toxic, a reproductive toxin, or highly reactive (pyrophorics; those that undergo vigorous polymerization, condensation or decomposition, or become self-reactive under conditions of shock or increased pressure or temperature; and those that react vigorously with water to release a lethal gas).
Radiation	Energy propagated over distance in the form of electromagnetic waves or by the emission of subatomic particles. Radiation is classified as “ionizing” if its interaction with matter causes neutral atoms or molecules to acquire a positive or negative charge (e.g., x-rays, gamma radiation, beta particles). Radiation is classified as “non-ionizing” if the waves or particles transfer energy to matter that result in molecular excitation or heating but does not create charged atoms or molecules (e.g., microwave ovens, visible light, infrared radiation, radio waves and radar).
Safety Committee	A group that meets regularly to proactively address department, unit or building safety concerns, provides solutions, disseminates safety

information, conducts Safety Self-Audits, and assists the Department Safety Coordinator (DSC).

Safety Self-Audit A process by which compliance with safety requirements is measured by a department, using a checklist provided by the Risk Management and Safety Department.

6. RESPONSIBILITIES

6.1 President

1. Assume overall responsibility for the implementation of the Health and Safety Policy at all facilities under University control.

6.2 Provost, Executive Vice-President, Vice-Presidents and Deans

1. Responsible for implementing and enforcing this policy in all facilities and operations within their respective jurisdictions.
2. Demonstrate leadership and commitment to safety.

6.3 Department Chairs and Directors

1. Communicate and implement the Health and Safety Policy and its requirements to faculty, staff and students.
2. Charge those individuals under their management with the authority to implement appropriate health and safety policies, practices and programs and to take corrective actions when necessary.
3. Implement and communicate procedures that direct all department personnel, including but not limited to principle investigators, supervisors, regular and temporary employees, visiting professors and students to obtain required safety training before they work with hazardous chemicals, biohazardous agents, radiation, or other physical/mechanical hazards in their working environments. Documentation for the completion of all training requirements shall be maintained by department chairs, directors, or designee(s) as appropriate.
4. Determine that health and safety program needs (e.g. training, protective equipment and corrective measures including noncompliance items identified in safety audits) have adequate funding.
5. Assign a responsible individual to serve as the Department Safety Coordinator and establish a Department or Building Safety Committee, and provide them with appropriate time and resources to administer their responsibilities. The Department Safety Coordinator, in consultation with Risk Management and Safety, may determine that the size of the department or the nature of the risks typically encountered, are such that an active safety program can be implemented without appointment of a Safety Committee.
6. Assign a Department Training Officer to conduct time critical safety training, if warranted.

6.4 Faculty, Principle Investigators, Supervisors

1. Implement the University's Health and Safety Policy and all other applicable University health and safety practices and programs.
2. Require all staff members and students under their direction to obtain and maintain required safety training prior to initiating work for which that training is applicable. See *Attachment A* for training requirements for employees.
3. Ensure that workplaces, laboratories, and equipment under their direction are safe, well-maintained, and in compliance with the Health and Safety Policy and other applicable University Health and Safety practices and programs.
4. Meet all safety needs for units/departments (e.g. engineering controls, training, personal protective equipment and corrective measures for noncompliance items identified in safety audits).
5. In a research setting, assign a laboratory safety coordinator to assist in implementing the Health and Safety Policy, if the size of the research group or activities warrants the need.
6. Establish Standard Operating Procedures (SOPs) when required for specific research involving high hazard chemicals (e.g. T-butyl lithium), radiation or biohazardous agents and train all lab personnel on lab specific SOPs and high hazards.

6.5 Department or Building Safety Committee

1. Promote safety at the department level and provide a forum for departmental participation in the overall University Health and Safety program.
2. Act as the conduit for information exchange between employees and Department leadership or Risk Management and Safety regarding unsafe acts or conditions, or new safety initiatives.
3. Ensure that work related injuries and illnesses and unsafe acts and conditions are properly and timely reported, investigated when appropriate, and findings reviewed with Risk Management and Safety.
4. Assign a contact to work with appropriate campus departments to coordinate fire drills, first aid and CPR training, emergency action training and other general safety training for the Department/Building.

6.6 Department Safety Coordinator

1. Serve on the Department or Building Safety Committee (where applicable) and assume additional responsibilities as assigned.
2. Assume the same responsibilities as the Department or Building Safety Committee when Risk Management and Safety determines that a committee is not required in order to implement a safety program for the unit.
3. Act as the advocate for safety within the Department.
4. Assist in implementing the University's Health and Safety Policy within the Department by encouraging and making employees and researchers aware of the required safety training, safety practices and compliance responsibilities with respect to applicable safety regulations.
5. Check annually or more frequently the First Aid Kits in the departments or labs and replenish supplies using the order form found in *Attachment B*.

6. Maintain records and investigative documents related to injuries, illnesses and unsafe acts and conditions reported within the department.

6.7 Research Group Safety Coordinator

1. Act as the advocate for safety within the Research Group.
2. Assist in implementing the University's Health and Safety Policy within the Group by encouraging and making laboratory personnel aware of the required safety training, safety practices and compliance responsibilities with respect to applicable safety regulations.

6.8 Risk Management and Safety Department (RMS)

1. Advise the University community of its responsibilities regarding the Health and Safety Policy.
2. Prepare documents and guidelines for programs to ensure individual and University compliance with relevant environmental health and safety laws, regulations, policies and guidelines.
3. Recommend programs and actions for compliance.
4. Consult with external entities and regulatory agencies on behalf of the University.
5. Develop and maintain effective programs including safety training for occupational health, hazardous materials management, radiation safety, general safety, workshop and studio safety, accident and fire prevention, biological safety, and disaster preparedness and emergency response.
6. Conduct Train-the-Trainer training for department safety training officers so that they may provide training as needed in between the regularly scheduled safety classes offered by Risk Management and Safety.
7. Provide guidance and technical assistance to supervisors and managers in colleges, schools, departments and other work units to identify, evaluate and correct safety hazards.
8. Review standard operating procedures (SOPs) for the safe use of high hazard chemicals, radiological and biological substances and class IIIB or IV lasers.
9. Conduct investigations of employee, student and visitor accidents and injuries and initiate corrective actions if warranted. Assist safety committee representatives with investigations if requested.
10. Monitor compliance with health and safety statutes and regulations and University health and safety policies, programs and guidelines.
11. Note instances of noncompliance and recommend improvements; submit these to the appropriate vice presidents, deans, directors, department heads and principal investigators who are responsible for schools, divisions, departments, laboratories and service units.
12. Manage hazardous waste disposal services.
13. Execute responsibilities involving inspection and enforcement delegated by any standing University Safety Committee (e.g. the Biosafety Committee, the University Radiation Control Committee).
14. Review self-audits.

6.9 Risk Management and Safety Director

1. Direct operations, services and safety programs of the Risk Management and Safety Department.
2. In cases of imminent danger to life or health, order the cessation of hazardous activity until the danger from such a condition is abated or adequate corrective measures have been taken.

6.10 Employees and Students

1. Comply with this policy and all other University health and safety practices and programs.
2. Maintain classrooms, work and laboratory areas safe and free from hazards.
3. Attend required health and safety training.
4. Notify a supervisor or instructor of any safety hazards in the workplace, classroom, or laboratory. If supervisor or instructor fails to address unsafe conditions or act, notify RMS of the hazard.
5. Keep informed of conditions affecting their health and safety.
6. Report all accidents and injuries to your supervisor or instructor.
7. Stop working or performing your assignment if employee or student feels he/she is in a dangerous work environment or classroom situation. Every employee or student has the right and responsibility to stop what they are doing to address the safety concerns with their supervisor or instructor.

7. PROCEDURES

Implementing Safety Programs To assist individuals and departments in meeting compliance with the University's Health and Safety Policy, Risk Management and Safety (RMS) has developed an Integrated Safety Plan (ISP) to promote safety and compliance throughout the campus community. The ISP is an incentive based approach which promotes broader employee involvement in workplace safety and health. The basis of the Plan is to create a partnership between RMS and departments. Please refer to the Related Documents section of this policy for complete details of the Integrated Safety Plan.

Reporting

How to report a health or safety hazard

There are four ways to report a health or safety hazard;

1. If you believe there is an immediate danger to the health or safety of yourself or others, call Notre Dame Security Police at 911 from a campus telephone or call (574) 631-5555 from a cell phone.
 2. If there is no immediate danger to the health or safety of yourself or others, but you believe there is an ongoing or potential hazard that may need attention, contact your supervisor.
 3. If the problem cannot be remedied by a supervisor, or a supervisor is not available, contact Risk Management and Safety (RMS) at (574) 631-5037.
 4. If talking with your supervisor or a representative from RMS is not an option in reporting a workplace safety concern, the ND Integrity Line is a toll-free number you can call to discuss your concerns about unsafe
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practices or conditions. The ND Integrity Line is available at any time of day or night. No call-tracing or recording devices are used. If you wish, you may remain completely anonymous. Call 1-800-688-9918 or file a report on-line: <https://www.compliance-helpline.com/NotreDame.jsp>

How to report an injury or accident

1. If any employee under your supervision is injured on university owned or occupied space, fill out a First Report of Employee Injury, Illness form located at: http://riskmanagement.nd.edu/assets/13343/froi_000.pdf within 24 hours of the time of the accident. This form, with instructions for its completion, is also available from your DSC, department administrator or RMS. When completed, send the form to the RMS office, 636 Grace Hall.
2. If someone other than an employee is injured on university-owned or occupied space, a University Injury/Illness/Incident Reporting Form (*Attachment C*) should be completed immediately by the building or department safety coordinator or the ND employee that witnessed the incident. This form is available from your DSC, department administrator or from RMS. When completed, send the form to RMS, 636 Grace Hall. If assistance is necessary during the incident, call the Notre Dame Security Police at 911 from a campus telephone or call (574) 631-5555 from a cell.

Inquiries from Regulatory Agencies

If you receive an inquiry from any regulatory agency regarding health and safety, direct the individual to RMS, 636 Grace Hall or contact us at 631-5037 and an RMS Representative will come to your location. Examples of these agencies are:

- Centers for Disease Control and Prevention (CDC)
- National Institutes of Health (NIH)
- Indiana Department of Environmental Management (IDEM)
- United States Environmental Protection Agency (USEPA)
- Indiana Occupational Safety and Health Administration (IOSHA)
- Occupational Safety and Health Administration (OSHA)
- United States Department of Labor (USDOL)
- United States Department of Transportation (USDOT)
- United States Nuclear Regulatory Commission (USNRC)
- Department of Homeland Security (DHS)
- Federal Aviation Administration (FAA)
- Drug Enforcement Administration (DEA)
- Indiana Board of Pharmacy

8. POLICY ENFORCEMENT

Enforcement Risk Management and Safety (RMS) will investigate suspected safety or health violations and may recommend corrective action in accordance with University codes of conduct, policies, or applicable laws and regulations. Where it appears that one or more individuals may be responsible for a violation, RMS may recommend one or more of the following:

- suspension or termination of access;
- corrective action up to and including termination of employment;
- student discipline in accordance with applicable University policy.

Reporting Violations If someone observes an individual performing unsafe acts or using unsafe equipment, or performing an act of non-compliance with federal, state or local regulations; RMS should be contacted immediately (574) 631-5037.

9. RELATED DOCUMENTS

Policy or Document	Web Address
Integrated Safety Plan	http://riskmanagement.nd.edu/safety-policies-consumer-warnings-and-reports/policies/
Workplace Safety/Campus Safety	http://riskmanagement.nd.edu/workplace-safety/
Other RMS Policies	http://riskmanagement.nd.edu/safety-policies-consumer-warnings-and-reports/policies/
Training provided by RMS	http://riskmanagement.nd.edu/training/
Laboratory Safety Standards	http://riskmanagement.nd.edu/laboratory-safety/

10. CONTACTS

Subject	Office or Position	Telephone Number	Office Email or URL
Policy Clarification	Risk Management & Safety	(574) 631-5037	http://riskmanagement.nd.edu/
Animal Care and use in Research	Institutional Animal Care and Use Committee IACUC	(574) 631-1461	http://or.nd.edu
Biological Safety	University Biological Safety Officer	(574) 631-5037	http://riskmanagement.nd.edu/
Chemical Waste Disposal, Lab and Chemical Safety	Risk Management and Safety, Chemical Hygiene Officer	(574) 631-5037	http://riskmanagement.nd.edu/
Disability Management	Office of Institutional Equity	(574) 631-0444	http://equity.nd.edu/
Departmental Safety Coordinators (DSC)	Risk Management and Safety	(574) 631-5037	http://riskmanagement.nd.edu/
Emergencies	ND Security Police	911 from a campus phone OR (574) 631-5555	http://ndsp.nd.edu/
Fire Protection, Fire Extinguishers	ND Fire Department	(574)631-6200	http://ndfd.nd.edu/

Health and Safety Education	Risk Management & Safety	(574) 631-5037	http://riskmanagement.nd.edu/
Human Subject Use in Research	Human Subjects Institutional Review Board (IRB)	(574) 631-1461	http://or.nd.edu
Institutional Biosafety	Institutional Biosafety Committee	(574)631-1461	http://or.nd.edu
Radiation Safety/Radiation Monitoring	Radiation Control Committee, Risk Management and Safety	(574) 631-5037	http://riskmanagement.nd.edu/
Recombinant DNA	Institutional Biosafety Committee	(574)631-1461	http://or.nd.edu
Controlled Substances	Risk Management & Safety	(574) 631-5037	http://riskmanagement.nd.edu/
Web Address for this Policy		http://policy.nd.edu/files/HealthandSafetyPolicy.pdf	

Attachment A: Training Requirements for Employees

Depending upon exposure in their workplaces, the following are examples of major training requirements for University employees. Risk Management and Safety (RMS) may also provide certain training for other university community members. For assistance, contact RMS at 631-5037.

Learning Objective	Regulatory Standard	Frequency
All New and Current Employees		
Injury Reporting	29CFR1904 Injury and Illness Recordkeeping Requirements	Initial and when there are changes
Access to medical Records	1910.1020 Access to employee exposure and medical records	Initial and when there are changes
Emergency Response Plan	1910.38 Emergency Action Plans	Initial and when there are changes
Office Workers		
Use of Chemicals	1910.1200 Hazard Communication	Annual
Laboratory Workers		
Ionizing Radiation Safety	10CFR19 Notice, Instructions and Report to Workers 10CFR20 Standards for Protection Against Radiation 410IAC5 Machine produced radiation	Initial and annual review
Laser Safety	ANSI Z136.1 Safe Use of lasers	Initial
Laboratory Safety	1910.1200 Hazard Communication 1910.1450 Occupational Exposure to Hazardous Chemicals in Laboratories (Lab standard) 1910.1030 Occupational Exposure to Blood-borne Pathogens 1910.133 Personal Protective Equipment 1910.134 Respiratory Protection 1910.1048 Formaldehyde 1910.1047 Ethylene oxide	Initial and annual review
Biological Safety	CDC, NIH guidelines	Initial and annual review
Controlled Substances Use	Indiana Uniform Controlled Substances Act 856 IAC 2, 21 USC 801, 21CFR Part 1300	Initial and when there are changes
Hazardous Materials in Transport	49 CFR 172 DOT IATA shipment of infectious materials/waste	Initial/ every 3 years Initial/ every 2 years
Fire Safety	1910.157 Portable Fire Extinguishers	Initial and annual review
Hazardous Energy	1910.147 Lockout/Tagout	Initial and when there are changes

Operations/Service Workers		
Use of Chemicals	1910.1200 Hazard Communication	Annual
Hearing Conservation	1910.95 Occupational Noise Exposure	Annual
Human blood or other potentially infectious materials	1910.1030 Blood-borne Pathogens	Initial and annual review
Ionizing Radiation Safety	10CFR19 Notice, Instructions and Report to Workers 10CFR20 Standards for Protection Against Radiation	Initial and annual review
Commercial Motor Vehicle Safety	Federal Motor Carrier Safety Administration	Initial
Forklift Operation	1910.178 Powered Industrial Trucks	Initial, post incident, and 3 year evaluation
Aerial Lift Operation	ANSI/SIA A92.2 through A92.6 Standards	Initially, post incident and when there are changes
Fall Protection	1926 Subpart M Fall Protection	Initial and when there are changes
Scaffolding Safety	1910.28 Safety Requirements for Scaffolding 1926 Subpart L Scaffolds	Initial and when there are changes
Confines Space Operations	1910.146 Permit Required Confined Spaces	Initial and when there are changes
Hazardous Energy	1910.147 Lockout/Tagout	Initial and when there are changes
Crane Safety	1910.179 Overhead and Gantry Cranes	Initial and every 3 years
Respiratory Protection	1910.134 Respiratory Protection	Initial and annual review
Pesticides	40 CFR Part 150-180	Initial and every 5 years
Health Services/Athletic Trainers		
Use of Chemicals	1910.1200 Hazard Communication	Initial and annual review
Human Blood or Other Potentially Infectious Materials	1910.1030 Blood-borne Pathogens	Initial and annual review
Campus Safety		
Human blood or other potentially infectious materials	1910.1030 Blood-borne Pathogens	Initial and annual review
Ionizing Radiation Safety	10CFR19 Notice, Instructions and Report to Workers 10CFR20 Standards for Protection Against Radiation	Initial and annual review
Emergency Response	1910.120 HAZWOPER	Initial and annual review

Attachment B: First Aid Supplies Order Form: University Health Services

to be completed by UHS

Item No.	Supplies	Start	Amounts Inventory	Order	Price
01	Standard Kit (\$35.00)	1			
02	Residence hall Kit (\$40.00)	1			
03	Exchange Kit*	1			
04	Adhesive Strips 1"x3"	100			
05	Antiseptic Towelettes	10			
06	Betadine Swabs	12			
07	Gauze Bandage 4" roll	1			
08	First Aid Instructions	1			
09	Triangular Bandage	1			
10	Cold Pack	1			
11	Scissors	1			
12	Forceps	1			
13	Thermometer –Oral digital	1			
14	Adhesive tape Roll, ½" micropore	1			
15	Triple Antibiotic Cream packets	12			
16	1% Hydrocortison Cream packets	12			
17	Eye Pads	2			
18	Latex Exam gloves	2 pr			
19	Sting Relief Wipes or medicaine swabs	3			
20	Gauze Pads, 3"	4			
21	Flexible strips 1"x3"	5			
22	Extra-Large strips	5			
23	Finger Tip bandages	5			
24	Knuckle bandages	5			
25	Burn Cream Packets	6			
26	Benadryl capsules for insect bites	6			
27	CPR Barrier Device	1			
28	Amoply-Ammonium Inhalants	3			
29	Glucose 15g	1			
	Residence Hall Supplies				
30	Advil	12			
31	Extra Strength Acetaminophen	12			
32	Throat Lozenges	6			
33	Advil Cold and Sinus	6			

*Exchange kit-Only supplies replaced will be charged (minimum \$5.00) **Total:** _____

Date: _____ Department: _____

Individual Completing Order form: _____ Phone No. _____

ACCT. No. _____

Signature-Budget Administrator

Delivery Address: _____

Orders are to be submitted to: Pharmacy-University Health Services 631-6574
 Supplies with a copy of this form will be delivered by campus mail or the person ordering supplies will be contacted for pick-up. Total will be charged to the Account Number provided.

Attachment C: Injury/Illness/Incident Report Form

Return to: Risk Management & Safety
 636 Grace Hall
 Notre Dame, IN 46556
 Phone: (574) 631-5037 // Fax: (574) 631-8794

Personal Information of the Injured

Name: _____		Job Title: _____	
Department: _____		Work Phone No.: _____	
Campus Address: _____		Phone No.: _____	
Home Address (visitors): _____			
Date of Birth: _____		Gender: <input type="radio"/> Male <input type="radio"/> Female	
Status: <input type="checkbox"/> Employee <input type="checkbox"/> Student Employee <input type="checkbox"/> Contractor <input type="checkbox"/> Student <input type="checkbox"/> Visitor <input type="checkbox"/> Volunteer			

The Accident/Injury/Exposure or Near Miss Incident:

Incident Date:	Did injury event occur at a university sponsored event?		
Incident Time:	Did the incident occur on university property?		
Where did the incident occur?			
Type of Incident: <input type="checkbox"/> Break <input type="checkbox"/> Burn <input type="checkbox"/> Exposure <input type="checkbox"/> Slip/Trip <input type="checkbox"/> Other <input type="checkbox"/> Bruise <input type="checkbox"/> Fall <input type="checkbox"/> Cut/Laceration <input type="checkbox"/> Near miss (injury did not occur but could have)			
What happened? (i.e. areas of body injured, the object/substance causing harm, etc.)			
Witness Name:	Address:	Phone No.	
Witness Name:	Address:	Phone No.	

Medical Treatment Received/Required

<input type="checkbox"/> Declined Treatment <input type="checkbox"/> Faculty/Staff Administered First Aid Only <input type="checkbox"/> ER/Urgent Care <input type="checkbox"/> No Treatment Required <input type="checkbox"/> NDSP/NDFD Administered First Aid Only <input type="checkbox"/> ND Health Services			
Detail treatment provided:			

Responsible Supervisory Person

Signature:	Today's Date:
Printed Name:	Work Phone No.:
Job Title:	Campus Address:

Forward a copy to the Risk Management & Safety Office