

**Subject: Health and Safety Policy**

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**1. Purpose**

This policy is intended to: help prevent accidents, illnesses and injuries; increase safety awareness; meet requirements of environmental, occupational health, and safety laws and regulations; reduce institutional liability; and establish safety responsibilities for members of the university community and visitors to university-owned or occupied property.

At Virginia Tech, safety is everyone's responsibility. All members of the university community are expected to 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.

This Health and Safety Policy reaffirms the university's commitment to safety and good environmental stewardship and establishes a uniform system 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.

Environmental Health and Safety (EHS) will work closely with departments, safety committees, employees, and students throughout the university to ensure compliance with this policy.

## **2. Policy**

Virginia Tech strives to maintain a safe living, learning, and working environment. Faculty, staff, students, and other members of the Virginia Tech community must conduct university operations in compliance with applicable federal, state, and local regulations, university policies and EHS requirements.

## **3. Procedures**

### **3.1 Responsible Parties**

#### **3.1.1 University President**

Assumes overall responsibility for the implementation of the university's Health and Safety Policy at all facilities under university control.

#### **3.1.2 Safety and Security Policy Committee**

The University Safety and Security Policy Committee is an operational committee appointed by the President to serve as a coordinating and policy body, with responsibilities for establishing the framework for an overarching university safety, emergency management, and security program for all Virginia Tech facilities (on- and off-campus, owned and leased) and ensuring that it is implemented through the appropriate offices; evaluating the overall safety and security infrastructure; and providing oversight to the work of university operational committees responsible for environmental health and safety, violence prevention, emergency management, and other safety and security related efforts.

#### **3.1.3 Provost, Vice Presidents and Deans**

Implement and enforce the Health and Safety Policy in all facilities and operations under their control.

#### **3.1.4 University Health and Safety Committee**

The university has established the Health and Safety Committee as a University Operational Committee with the authority to oversee university compliance with the Health and Safety Policy.

#### **3.1.5 Directors/Department Heads**

1. Implement the Health and Safety Policy and communicate its requirements to faculty, students, and staff.
2. Designate and empower a safety team as necessary to address and coordinate safety efforts and work with EHS within departments/units.
3. Designate and empower safety representative(s) for departments, units, or sections to ensure compliance with the Health and Safety Policy and program requirements. This representative will work with EHS staff to develop and maintain safety programs. Submit representative's name annually to EHS upon request.
4. Ensure individuals, including but not limited to principal investigators, supervisors, regular and temporary employees, visiting professors, and students, obtain any required safety training before they work with hazardous chemicals, biohazardous agents, radiation, or physical/mechanical hazards in their working or learning environments.
5. Report all accidents, job-related illnesses, and work site injuries to Human Resources. Also, conduct a review and investigation of all job-related illnesses, accidents, and work site injuries as needed to complete the Employer's Accident Report and to identify if there are workplace hazards that need to be corrected.
6. Determine whether safety needs for units/departments are met (e.g., training, personal protective equipment, and corrective measures including non-mandated items identified in safety audits).

7. Incorporate workplace safety requirements and responsibilities into each appropriate job description and ensure that workplace safety expectations are communicated to each employee.
8. Ensure that periodic safety self-audits of work areas and/or facilities are conducted.
9. Ensure that emergency action preparedness plans are developed and communicated to all personnel in order to ensure familiarity and coordination between facility personnel and emergency responders. Submit annually updated departmental emergency action plans (EAPs) and continuity of operations plans (COOPs) to the Office of Emergency Management within prescribed guidelines.
10. Ensure that instructional activities within their units are evaluated for potential safety and health exposure risks and all reasonable steps have been taken to reduce or mitigate such exposures as outlined in EHS' *Guidelines on Safety in Research and Educational Activities*. The review should include consideration of the conduct of the class, including the level of supervision needed to assure adequate oversight of student activities and allied instructional activities. Attention should be given also to non-traditional activities such as mini-courses, non-credit or optional activities associated with a course.
11. Require that all proposed and current research activities are reviewed to assure hazard exposures have been identified and all reasonable steps have been taken to reduce or mitigate such exposures as outlined in EHS' *Guidelines on Safety in Research and Educational Activities*.

### **3.1.6 Faculty, Principal Investigators, Supervisors, and Safety Representatives**

1. Implement the university's Health and Safety Policy and all other university safety programs in work areas under their supervision/control.
2. Determine what health and safety training is required by all staff members and students under their direction and assure they attend and maintain current required training.
3. Attend and maintain current all necessary health and safety training.
4. Maintain workplaces and equipment under their control in a safe, well-kept condition. Ensure compliance with the Health and Safety Policy in these workplaces.
5. Assure that hazards are proactively identified and corrected by implementing engineering or administrative controls, or by assuring use of necessary personal protective equipment.
6. Dispose of waste properly and in accordance with university, state and federal requirements.
7. Review instructional activities for potential safety and health exposure risks and ensure that all reasonable steps have been taken to reduce or mitigate such exposures as outlined in EHS' *Guidelines on Safety in Research and Educational Activities*. The review should include consideration of the conduct of the class, including the level of supervision needed to assure adequate oversight of student activities and allied instructional activities. Attention should be given also to non-traditional activities such as mini-courses, non-credit or optional activities associated with a course.
8. Ensure proposed and current research activities are reviewed to ensure hazard exposures have been identified and all reasonable steps have been taken to reduce or mitigate such exposures as outlined in EHS' *Guidelines on Safety in Research and Educational Activities*.
9. When vacating a work area, ensure all hazardous materials are properly disposed of or packaged for transfer, all equipment is decontaminated and cleaned, and that the work area (including work surfaces, cupboards, cabinets, and floors) is thoroughly cleaned and, as required, decontaminated. Ensure that all chemicals used or stored in a location are reported to EHS annually.

### **3.1.7 Employees and Students**

1. Comply with this policy and all other university health and safety programs.
2. Ensure that required health and safety training is current and/or has not lapsed.

3. Wear personal protective equipment as required by the supervisor when working with hazardous materials or performing hazardous operations.
4. Inform a supervisor or instructor of any safety or health hazards in the workplace on university property, or in areas tenanted or used by Virginia Tech.
5. Know your role in an emergency.

### **3.1.8 Contractors**

1. Comply with Virginia Tech's *Safety Requirements for Contractors and Subcontractors* program.

### **3.1.9 Human Resources**

1. Include the Health and Safety Policy in appropriate informational handbooks, brochures, and trainings.
2. Refer unresolved safety matters to EHS for assistance, review, and resolution.
3. Maintain a database of completed accident reports.

### **3.1.10 Environmental Health and Safety (EHS)**

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 adopted guidelines.
3. Recommend programs and actions for compliance.
4. Consult with regulators and other external entities on behalf of the university.
5. Provide guidance and technical assistance to supervisors and managers in colleges, schools, departments, and other work units in identifying, evaluating, and correcting safety and health hazards.
6. Provide required training.
7. Conduct investigations and analyses of occupational accidents and injuries.
8. Monitor compliance with health and safety statutes and regulations and university policies and health and safety program requirements.
9. Identify noncompliant situations and recommend improvements; submit these to vice presidents, deans, directors, department heads, supervisors and principal investigators who are responsible for departments, laboratories, units, and work areas.
10. Ensure that hazardous materials are disposed of properly.
11. Execute responsibilities involving inspection and enforcement delegated by any standing university safety committee.
12. 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 measures have been taken.
13. Appraise the administration of compliance status.
14. Conduct fire safety training, reporting and drills.

### **3.1.11 Office of Emergency Management (OEM)**

1. Ensure departments develop departmental emergency action plans (EAPs) and continuity of operations plans (COOPs) that adhere to the guidelines and standards established under the authority of the Safety and Security Policy Committee.
2. Provide a central program to manage departmental emergency action plans and continuity of operations plans annually and review all plans on a three year rotating schedule.
3. Provide guidance and training to departments, as well as documents and guidelines, for programs to ensure compliance with federal, state and university emergency planning and continuity of operation planning guidelines.

### 3.1.12 Office of Research Compliance (ORC)

1. Ensure overall university compliance for research, teaching, and testing activities involving human subjects, vertebrate animal species, radioactive materials and radiation-producing equipment.
2. Ensure compliance with International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR) governing materials, personnel, or activities.

## 3.2 Policy Compliance

The following committees oversee and assure that specific regulatory or policy requirements are met including, where applicable, the review, approval or rejection of research protocols.

Committee	Ensures Compliance with University Policy and/or Research Activities Involving:
Health and Safety Committee	Health and Safety Policy
Institutional Animal Care and Use Committee	Vertebrate Animals
Institutional Biosafety Committee	Agents infectious to humans, animals, and plants, recombinant DNA use, toxins of biological origin, select agents and toxins, human, non-human primate, and mammalian blood, blood products, cells, and unfixed tissue
Institutional Review Board	Human Subjects
Radiation Safety Committee	Radioactive materials and radiation-producing equipment
Chemical Safety and Hazardous Materials Management Committee	Hazardous materials management and laboratory safety
Occupational Health and Safety Committee	Physical, fire, safety and occupational health hazards

## 4. References

### 4.1 Related University Policies/Documents/Programs

- Asbestos Operations and Maintenance Program
- Autoclave Use and Verification Program
- Biological Safety Program
- Bloodborne Pathogens Programs/Exposure Control Plan
- Chemical Hygiene Plan
- Confined Space Entry Program
- Contractor Safety Requirements
- Electrical Safety Program
- Employer's First Report of Accident
- Ergonomics Program
- Excavation, Trenching, and Shoring Program
- Fall Protection
- Fire and Life Safety Program
- Guidelines on Minors in the Workplace
- Lockout/Tagout Program
- Nanomaterials Program
- Occupational Health Assurance Program
- Personal Protective Equipment Program
- Radioactive Material Safety Program
- Respiratory Protection Program
- Safety Requirements for Contractors and Subcontractors
- Select Agent and Toxin Program
- Tuberculosis Exposure Control Program
- University Policy 4415, Workers Compensation Program (<http://www.policies.vt.edu/4415.pdf>)
- University Policy 5615, University Safety and Security (<http://www.policies.vt.edu/5615.pdf>)
- University Policy 5616, Campus and Workplace Violence Prevention Policy

- Guidelines on Safety in Research and Educational Activities (<http://www.policies.vt.edu/5616.pdf>)
- Hazard Communication Program (for chemicals)
- Hazardous Materials Management Program
- Hearing Conservation Program
- Hot Work Permit Program
- Infection Prevention Program
- Laser Safety Training Manual
- Lead Hazard Control Program
- University Policy 13035, Animal Research Policy (<http://www.policies.vt.edu/13035.pdf>)
- University Policy 13030, Recombinant DNA and Biohazard Research Policy (<http://www.policies.vt.edu/13030.pdf>)
- University Policy 13040, Human Subjects Research Policy (<http://www.policies.vt.edu/13040.pdf>)
- X-Ray Safety Handbook

For a complete listing of EHS programs, see [www.ehss.vt.edu](http://www.ehss.vt.edu).

## 5. Approval and Revisions

Approved January 10, 2001 by the Vice President for Administration and Treasurer, Raymond D. Smoot, Jr.

- Revision 1

Section 3.2. Asbestos Operations and Maintenance, and Lead hazards and Lead-Based Paint moved from Occupational Safety Division to Occupational Health and Industrial Hygiene Division. Machine Shop Safety and Scaffolding added to Occupational Safety Division.

Approved May 6, 2002 by Vice President for Administration and Treasurer, Raymond D. Smoot, Jr.

Policy 5800: Health and Safety Policy renumbered April 15, 2003 to Policy 1005 and moved to General University Policies list.

- Revision 2

Changes to entire policy to update and clarify requirements and update information related to university committees that address safety and health issues at the university.

Approved February 28, 2007 by Executive Vice President and Chief Operating Officer, James A. Hyatt

- Revision 3

April 1, 2008: Updates to position titles and/or responsibilities due to university reorganization.

- Revision 4

Updated section 3.1 to include reference and description for the Safety and Security Policy Committee and to correct the title of the Health and Safety Committee; added requirement that Directors/Department Heads submit safety representative's name annually to EHSS, as well as submit annually updated departmental emergency action plans (EAPs) and continuity of operations plans (COOPs) to the Office of Emergency Management; added sections stating the responsibilities of the Office of Emergency Management and the Office of Research Compliance; and updated the listing of committees that oversee regulatory and policy requirements and the listing of university policies, documents and programs related to health and safety.

Approved December 2, 2010 by President Charles W. Steger

- Revision 5
  - Added subsection headers to section 3.1 for ease of navigation.
  - Additional responsibilities outlined in sections 3.1.5 and 3.1.6 related to reviews of instructional and research activity, and hazardous material storage, disposition, and decontamination.
  - Additional responsibility included in 3.1.7 related to use of personal protective equipment.
  - Technical updates to department and committee titles and references.

Approved December 14, 2016 by President Timothy D. Sands.