

OCCUPATIONAL SAFETY & HEALTH PROGRAM

**THIS OCCUPATIONAL SAFETY AND HEALTH
PROGRAM CAN ONLY BE EFFECTIVE IF IT IS PUT
INTO PRACTICE**

NAU and NAU's executive leaders are committed to ensuring the safety of University faculty and staff. Our philosophy is that integration of safety practices into daily activities is essential to reduce risks and incidents. And that everyone is responsible for maintaining a safe working and learning environment.

To support this commitment, NAU's Environmental Health and Safety (EHS) department has created an Occupational Safety Program which addresses potential and identified hazards associated with workplace environments and tasks in the Construction, Skilled Trades and Maintenance, Unions, Fine and Performing Arts, and Campus Activities departments. This content may also have application in other areas of campus.

While the pressures and schedule requirements for day to day business can't be ignored, safety always takes precedence over expediency, and financial burden or time deadlines never constitute acceptable justification for bypassing required safety regulations or safe work practices. At NAU, Safety is considered a job assignment and measure of performance. Poor safety performance is not tolerated among NAU Employees.

NAU EHS develops, manages, and is responsible for campus safety program content and expertise. And works with the Campus Safety Committees to develop systems for identifying and correcting hazards. Supervisors are responsible for using these resources to ensure that employees receive all required training, equipment, and other support necessary to perform their assigned duties in a safe and legal fashion. Employees are responsible for adhering to campus and departmental standards and expectations for safety, for reporting unsafe conditions, and requesting assistance when safety is in question. Campus executives will do our part by devoting the resources necessary to provide for the safety of employees. We will plan for foreseeable emergencies. We will provide initial and ongoing training for employees and supervisors. And we will establish a disciplinary policy to ensure that company safety policies are followed.

Safety is a team effort—Let us all work together to maintain a safe and healthy workplace.

Distribution of Responsibilities

Executive/Manager Commitment

1. Ensure that a department/division wide safety committee is formed and carries out its responsibilities as described in this program.
2. Ensure that sufficient employee time, supervisor support, and funds are budgeted for safety equipment, training and to carry out safety program requirements.
3. Evaluate supervisors each year to make sure they are carrying out their responsibilities as described in this program.
4. Ensure that incidents and near misses are fully investigated, and corrective action taken to prevent the hazardous conditions or behaviors from happening or reoccurring.
5. Ensure that employees and supervisors participate in the online [Report of Injury](#) system to ensure the highest standard of employee care and record injuries and illnesses.
6. Set a good example by following established safety rules, attending required training and rewarding good safety performance among staff and supervisors.
7. Report unsafe practices or conditions to the supervisor of the area where the hazard was observed. Follow up to confirm corrective action is taken.

Supervisor Responsibilities:

1. Ensure that each employee receives department specific initial orientation which includes general safety instruction and safety performance expectations *before* beginning work.
2. Ensure that each employee is competent or receives training on safe operation of specific equipment or tasks *before* being authorized to work on that equipment or project.
3. Ensure that each employee receives any required personal protective equipment (PPE) and adequate PPE training and medical fitness check *before* starting work requiring PPE.
4. Perform routine safety-checks of the work area(s) and equipment of staff. Promptly correct any hazards.
5. Observe the work activities of employees you supervise. Promptly correct any unsafe behavior. Provide training and take corrective action as necessary. Document safety performance during employee evaluations.
6. Set a good example for employees by following safety rules and attending required training. Reward good safety performance among employees.
7. Investigate all incidents in your area and report your findings to management and your safety committee representative.
8. Talk to employees and management about changes to work practices or equipment that will improve employee safety. Make changes or request resources as necessary to reduce risk of injury or incident.

Employee Responsibilities

1. Follow safety rules described in this document, NAU safety standards, and training you receive.
2. Promptly report unsafe conditions or actions to your supervisor or safety committee representative.
3. Report all injuries to your supervisor promptly regardless of severity.
4. Promptly report all near-miss incidents to your supervisor and safety committee representative.
5. When possible use alternate hazard controls (elimination, substitution, engineering control, administrative control) instead of or in addition to PPE, which is only intended to be the last defense against hazards. Use appropriate personal protective equipment (PPE) in good working condition when it is required.
6. Do not remove or defeat any safety device or safeguard provided for employee protection.
7. Encourage co-workers through words and example to use safe work practices while on the job. Ask for assistance if safety is in question. Offer assistance if unsafe conditions or practices are noted.
8. Make suggestions to your supervisor, safety committee representative or management about changes you believe will improve employee safety.

Safety and Health Training and Education

Safety Training

Training is an essential part of our plan to provide a safe workplace NAU. To ensure that all employees are trained *before* they start a task that requires training, EHS provides departments with specific training matrices which are included with department JHA's. Supervisors are responsible for assigning and verifying that each employee has received an initial shop specific

orientation (this is not the New Employee Welcome training which HR provides), has received any training needed to perform their duties safely, and that this training is documented in department personnel files. Required training may include not only shop-specific training provided by the supervisor, but organized training provided by EHS or third-party training providers. EHS can provide assistance and will be responsive to requests for employee training when they are made.

If a shop or activity specific training matrix is not available, please contact EHS for assistance or to perform a task analysis for the purpose of determining training needs prior to releasing employees to perform work.

Employee Participation

Safety Committee

NAU has formed a safety committee structure to help employees and management work together to identify safety problems, develop solutions, review incident reports and evaluate the effectiveness of safety programs. The committees are made up of volunteer, management-designated or employee-nominated representatives from the office, department, or division being represented. Committees typically meet quarterly or monthly.

- ◆ Employees may volunteer or be nominated by peers or supervisors. Supervisors must approve the time allotted for committee participation.
- ◆ Representatives will serve for one year before being re-elected or replaced. If there is a vacancy the remaining committee members will solicit new membership through the local chain of command.
- ◆ A chairperson will be selected by majority vote of the committee members each year. If there is a vacancy, the same method will be used to select a replacement.
- ◆ In addition to the committee responsibilities described above, duties of safety committee members include:
 - A periodic self-inspection of the area they represent which corresponds to the committee meeting schedule.
 - Review of incident and near miss reports to find solutions or preventive measures, or to forward issues to the Campus Safety Culture Steering Committee for administrative action.
 - Communicating with the employees they represent on safety issues and serving as liaison between employees and the Campus Safety Culture Steering Committee and Executive Leadership Team.
 - Encouraging safe work practices among co-workers.
- ◆ Meetings are regularly scheduled, and the specific dates/times will be established at the beginning of each term/year by committee consensus.
- ◆ A committee member will be designated each month to keep minutes of the meeting. A copy will be posted on the department bulletin board or another prominent, established location

after each meeting. After being posted for one month, the minutes will be filed for posterity. The minutes should include the monthly meeting agenda.

Departmental Safety Meetings

All employees are required to attend a monthly safety meeting held by department supervisors or managers. This meeting is to help identify safety problems, develop solutions, review incident reports (and forward to safety committee for action or review), provide training and evaluate the effectiveness of safety measures. These tasks may also be performed during routine staff meetings. Meeting minutes should be kept on file by the department supervisor and be accessible to employees.

Injury/Incident Record Keeping and Review

Employees are required to report any work related injury or illness to their immediate supervisor regardless of severity. The employee/supervisor must use the NAU [Report of Injury](#) system to record injuries.

If a work-related illness or injury is not life or limb threatening, then the employee should:

1. Report the injury/illness to their supervisor immediately.
2. Call 800-685-2877 to speak with a Registered Nurse at the State of Arizona Workers' Compensation's Employee Injury Call Center.
3. You should identify your employer as The State of Arizona. After the *employer* is understood, the Agency Code 416 may be given, which will draw their attention to Northern Arizona University and the services available here on campus.
4. Important: There is no change in the emergency process. If an employee has work-related illness or injury that is life or limb threatening the employee or supervisor will call 911.

The supervisor will:

Once a supervisor is notified of an employee's work related illness or injury the supervisor will submit a report to Human Resources within 24 hours by means of the online [Report of Injury \(ROI\) form](#).

The online Report of Injury (ROI) is available through Louie Department Self Service.

- Sign on to [LOUIE](#)
- Select **Department Self Service**
- Select **Report of Injury Home Page**
- Choose Create a **Report of Injury**

The NAU Human Resources (HR) department will post a signed copy of the OSHA log summary for the previous year each February 1 until April 30. Logs are posted in the HR office lobby. The log will be kept on file for at least 5 years. Any employee can view an OSHA log upon request at any time during the year.

In addition to reporting injuries to supervisors, employees or supervisors may need to initiate an incident/near miss investigation or review by the division safety committee (see next section) in order to remedy conditions which could create repeat incidents.

Incident/Near Miss Investigation

Process to be determined by Facility Safety Committee and/or the Campus Safety Culture Steering Committee. Contact EHS or Campus Safety Culture Steering Committee for guidance until updates are posted.

Safety Inspection Procedures

NAU is committed to identifying hazardous conditions and practices which may result in injury or illness to employees. In addition to reviewing injury records and investigating incidents for cause, management and the safety committees will regularly check the workplace for hazards and take prompt action to correct noted hazards.

Annual Site Survey -- Once a year the safety committee will perform walk through inspection of the entire department or a reasonable quantity of representative work locations across the campus. They will record any safety hazards or potential hazards they find. The results of this inspection will be shared with department managers and supervisors, and the Campus Safety Culture Steering Committee. Survey results will be used to eliminate or control hazards, target specific areas for additional assistance, revise safety programs/materials, and measure the effectiveness of Safety and Health Programs.

Periodic Change Survey – Safety Committees will assign a committee representative(s) or department staff member(s) to observe any changes to identify safety issues. Changes include new equipment, new work practices or settings, or changes to building structures. Observations will be for the purpose of making recommendations to eliminate or control any hazards that arise as a result of the change. Department staff may trigger surveys by contacting a committee representative regarding a specific change.

Routine Safety Inspection -- Before the regularly scheduled safety committee meeting, committee members will inspect their areas for hazards. They will ask co-workers about any safety concerns. Inspections may be conducted as a discreet event or on an ongoing basis during regular daily activities. Committee members will report hazards or concerns to the committee for consideration. The results of the routine inspection and any resulting action or recommendation will be posted in the affected area. Occasionally, committee members may agree to inspect each other's area rather than their own. This brings a fresh pair of eyes to look for hazards.

Job Hazard Analysis -- NAU uses a “Job Hazard Analysis” process to look at specific work tasks and sites. This analysis is performed as a cooperative effort between NAU EHS and department staff/supervisors. Supervisors and staff will change how tasks are performed to eliminate or control identified hazards. EHS will recommend training, special work practices, or personal protective equipment (PPE) required for specific tasks. Supervisors will ensure that employees are appropriately trained and equipped based on these recommendations. Each job task will be analyzed every two years, whenever there is a change in how the task is done, or if there is a serious injury while performing the task. Staff and Supervisors may initiate JHA analysis or review by contacting EHS for assistance.

Eliminating Workplace Hazards

NAU is committed to eliminating or controlling workplace hazards that could cause injury or illness. We will meet the requirements of state and federal safety standards where there are specific rules about a hazard or potential hazard in the workplace. We will work to design facilities and processes to minimize employee exposure to hazards. When completely safe designs are not possible, NAU will create Standard Operating Procedures (SOP's) that effectively control potential exposure to hazards. When adequate methods of control are not possible or are not fully effective NAU will require employees to use personal protective equipment (PPE) such as safety glasses, hearing protection, foot protection etc. Use of PPE will not be considered as a first choice or substitute for more effective hazard controls or safe design.

Basic Safety Rules

The following basic safety rules have been established to help make NAU a safe and efficient place to work. These rules are applied in addition to specific safety rules that must be followed when performing particular tasks or operating certain equipment. Those specific rules are listed elsewhere in this program, EHS safety resources, or department specific training and SOP's. Failure to comply with these rules may be considered as a work performance or disciplinary issue.

- Never do anything that is unsafe in order to get the job done. Injury prevention is more important than task completion. If a job appears unsafe, report it to your supervisor, EHS, or safety committee. NAU will confirm the safety or find a safer approach.
- Do not remove or disable any safety device. Keep machine guards in place at all times.
- Never operate equipment unless you have been trained and are authorized to use it.
- Use appropriate personal protective equipment whenever it is required and/or other hazard control measures will not work.
- Obey all safety warning signs and labels.
- Working under the influence of alcohol or illegal drugs or using them at work is prohibited.
- Smoking or using nicotine products on University property is prohibited.
- Horseplay, running and fighting in the workplace are discouraged and/or prohibited
- Clean up spills immediately. Put away tools and replace supplies after use. Do not allow scraps or debris to accumulate where they will become a hazard. Good housekeeping helps prevent injuries.

Job Related Safety Rules and Job Hazard Analyses

NAU has established safety rules, training, SOP's, and personal protective equipment (PPE) requirements based upon job hazard assessment for specific tasks. JHA information is accessible through department safety binders, BioRaft electronic safety resources, or by contacting EHS. Resources for some universally applicable subjects is listed below. More detailed training is available through EHS. Shop specific training will be provided by department supervisors.

Hazard Inspection and Communication

EHS has developed a hazard inspection program for the purpose of identifying and communicating workplace hazards and hazard controls BEFORE work begins. Any work which is expected to disturb more than ½ square foot of installed building materials, or involves use of ppe/safety equipment or exposure to commonly recognized hazards (IE falls, electricity, pinch points, or strike/falling object hazards) should be inspected for potential hazards prior to the start of work.

Hazard inspections may be requested by contacting EHS by phone or email, or by filling out the request form on the [EHS website](#)

Employee Performance Policy

Employees are expected to use good judgment and to follow established safety rules while performing their duties. Safety may be used as an evaluation metric and good safety performance can be used as justification for employee rewards, promotion, or other incentives.

NAU HR has established performance criteria to help employees and supervisors work effectively to improve performance. This policy is designed to bring unacceptable behavior to the employee's attention in a way that the employee will be motivated to make corrections. It is the supervisor's responsibility to manage staff performance and discipline in the most appropriate and effective manner. The following proposed responses are based on NAU's [progressive discipline policy](#) and may be used by supervisors for safety violations. In certain circumstances it may be appropriate to escalate directly to HR involved disciplinary actions if a safety violation places the employee or co-workers at risk of permanent disability or death (See HR website for complete policy details):

Performance Feedback: An individual discussion is used to assist the employee to improve work performance or comply with policies and procedures. Discussions should be a cooperative attempt at identifying and correcting performance. Department heads should keep notes of such discussions.

Written Warning: Used for failure to meet job requirements or violations of rules and/or policies, or when performance feedback has not produced satisfactory results. Written warnings shall specify the performance concerns and what action is required to correct them.

A written warning shall explicitly state that it is a "written warning" and the department head will provide a copy to the employee and retain a copy in the department file. This letter will not become part of the employee's official employment file maintained by the Human Resources Department. A warning is not subject to the grievance procedure by an employee, since no punitive action has been taken.

Pre-Disciplinary Conference and Disciplinary Action: A meeting in which the supervisor informs the employee of possible disciplinary action, considers the employee's input about performance and possible disciplinary action and renders a decision to the employee verbally and in writing.

Prior to grievable disciplinary actions occurring, the supervisor must consult with a Human Resources Department representative. The employee or supervisor may request the presence of a Human Resources Department representative at the pre-disciplinary conference. During this meeting the disciplinary action being considered as well as the basis for that action will be

provided. The employee will have an opportunity to share information that may impact the decision. The completed pre-disciplinary conference form should be forwarded to the Human Resources Department, with a copy maintained by the supervisor and employee.

Disciplinary Actions (Must be undertaken in cooperation with NAU HR)

Letter of Reprimand: The least severe form of disciplinary action and is typically given after a written warning or other performance feedback has failed. It may be appropriate to use this form of discipline without prior warnings in certain circumstances. A letter of reprimand is differentiated from a letter of warning in that a copy of the reprimand is placed in the employee's official personnel record in the Human Resources Department and it is subject to the informal, but not the formal, grievance process. *Refer to Policy 5.21 Grievance Procedures.*

Disciplinary Suspension

The temporary release of an employee from duty. It is applicable when a violation(s) or repetition of violation(s) of applicable rules or policies are serious enough to warrant suspension

A disciplinary suspension should be applied in direct proportion to the significance of the offense but shall not exceed thirty calendar days. An employee does not receive pay for periods of disciplinary suspension; however, benefit programs continue in force. This action is subject to the grievance policy.

Demotion (Involuntary): An employee may be re-assigned to a lower position at a lower grade as the result of disciplinary action. Refer to Pay Changes for determination of the new pay rate in the event of a demotion. This action is subject to the grievance policy.

Dismissal: The most serious form of discipline is dismissal, the involuntary termination of employment. Prior to making a final decision to dismiss an employee, the department head must have concurrence of the Chief Human Resources Officer. This action is subject to the grievance policy. Refer to Termination for information regarding termination policy and procedures.

Equipment Maintenance

In most cases, departments which have power tools, machinery, and equipment are responsible for scheduling and recording routine condition inspections and repairs. Department inspection and service records will be kept for the life of the equipment, and can/should be used to anticipate equipment replacement for budget and schedule purposes. Inspection/repair forms are available in department JHA binders or from EHS.

Any equipment found to be damaged, defective, or worn beyond safe use must either be tagged "do not use" and taken out of service for repair or decommissioned and disposed in a manner which meets NAU property control standards.

Equipment that must be certified, inspected or serviced on a routine basis may be performed by contract at the department or divisional level. It is the department's responsibility to ensure that

all equipment is properly maintained and inspected. Records of all legally or contractually required inspections must be properly maintained as University records.

*Forklifts are required to be inspected daily prior to being placed into service or after each shift if used on a round-the-clock basis. Departments must keep daily inspection records

Emergency Planning

What will we do in an emergency?

Comprehensive Emergency Procedures can be found in the NAU Emergency Action Plan available through the [NAUPD Office of Emergency Management](#)

The Emergency Action Plan covers emergencies which fall outside of normal Occupational Safety including (not limited to) severe weather, earthquake, wildfire, active shooter, and other similar emergencies.

In case of fire

[NAU Fire Safety Manual](#)

All fires must be reported to NAUPD or the Fire Marshal, regardless of size.

Evacuation maps are posted near exits of most campus buildings. Maps show the location of exits, fire extinguishers, first aid kits, and where to assemble outside.

Except in rare circumstances, employees are not trained in the use of fire extinguishers and are not expected/encouraged to fight fires. Fire extinguishers are placed in most buildings for use by trained emergency responders. In the event of fire, follow the procedures in the NAU [Fire safety manual](#).

A fire emergency exists whenever:

- A building fire evacuation alarm is sounding. (Campus buildings will be immediately and totally evacuated whenever the building fire alarm is sounding.)
- There is presence of smoke, or the odor of burning.
- An uncontrolled fire or imminent fire hazard occurs in any building or area of the campus.
- There is a spontaneous or abnormal heating of any material, an uncontrolled release of combustible or toxic gas or other material, or a flammable liquid spill.

When a fire emergency exists, an individual will accomplish, or attempt to accomplish, the following actions:

- Activate fire alarm system located along exit routes.
- Evacuate the building. Do not use elevators.
- Call 523-3000 or 911 from a safe area and give name, location, and nature of emergency.
- Remain at a safe location at least 100 feet away from the building until you are told to re-enter by the City Fire Department, University Police Officer, or other emergency personnel.

***For activity specific Occupational Safety Program content, please refer to the document library on the NAU EHS Occupational Safety Program web page, or specific safety programs listed on the Safety Programs page.**

<https://in.nau.edu/environmental-health-and-safety/safety-programs/>