



FGCU Injury and Illness Prevention Program

Document location: www.fgcu.edu/ehs

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Introduction:

The responsibility for creating a safe and healthful work environment at Florida Gulf Coast University resides with every employee. Key to this effort is identifying and addressing the potential hazards related to each job task. The Injury and Illness Prevention Program (IIPP) provides a framework for identifying and mitigating workplace hazards.

Campus supervisors and employees routinely conduct workplace hazard assessments to varying degrees. The IIPP formalizes this process, provides for written records to measure progress, and creates a system compatible with the Plan-Do-Check-Act process to provide continuous improvement of workplace safety.

Definitions:

Competent Person - An individual designated by the department who, by way of training and/or experience is capable of identifying workplace hazards relating to the specific operation, and has authority to take appropriate actions.

Department - The level of any organization within FGCU for which an IIPP is prepared and implemented. This may be as large as a Division, or as small as a specific shop. For most purposes, each department within a division or a school within a college will be the most appropriate level to prepare an IIPP.

Employee - Any paid or volunteer member of the University staff or faculty.

Job Hazard Analysis (JHA) - A technique to identify, document and address the dangers to workers from specific workplace tasks.

Non-routine Work - A task that does not occur on a regular basis. This work is a special concern because training programs often do not address non-routine jobs and unusual circumstances.

Supervisor - Any employee responsible for oversight of other employees.

Commitment and Assignment of Responsibilities:

Responsibility for workplace safety includes all University employees. Below are specific responsibilities under the FGCU Injury and Illness Prevention Program.

The President of the University, as the chief executive of the University, has ultimate responsibility for establishing and maintaining effective health and safety policies at FGCU rests with the University President. Vice presidents are responsible to support and ensure the effective implementation of the IIPP within their reporting unit.

Department Heads/Deans/Directors and Chairs are responsible for promoting a positive attitude toward safety and compliance practices, identifying budget requirements, and developing departmental safety programs and records systems consistent with this guideline.

Supervisors have many responsibilities in creating and maintaining a safe workplace. Through their actions, they create a positive attitude about job safety and compliance amongst their employees. Supervisors identify hazards through job hazard assessments and routine inspections, and take action to control identified hazards. They develop safety procedures as needed, provide training and guidance to employees, and ensure their employees comply with applicable rules, policies, and procedures.

Employees are responsible for complying with all safe work rules, policies, and procedures applicable to their jobs, and to take every reasonable precaution to protect the life and health of themselves and other employees. Each employee must know and implement the safety requirements of her or his work assignments, use and maintain the protective equipment provided, and report safety related problems or concerns to their supervisor, department head and/or EHS. Employees are only to perform tasks for which they have received adequate training.

Environmental Health and Safety's responsibility is to assist all University employees in meeting their responsibility to ensure a safe and healthy workplace. EH&S provides consultation to the FGCU community on workplace safety and compliance, including guidance for controlling workplace hazards and interpretation of applicable standards or regulations. EH&S assists departments in monitoring worksites to identify and assess hazards, develops and conducts campus wide training, and provides technical support.

Hazard Identification:

The primary responsibility for identifying and protecting employees from hazards in the workplace lies with the work supervisor. Information identifying potential hazards may come from a variety of internal and external sources.

Federal, state, or local agencies identify some workplace hazards by issuing a rule or standard declaring an activity or material hazardous. Examples include OSHA forklift operation, potential exposure to blood borne pathogens, formaldehyde use, entry into confined spaces, etc.

Documents such as ANSI standards identify workplace hazards based on industry consensus, and describe accepted safe methods for performing the task.

Other workplace hazards are a result of specialized work areas or tasks. The supervisor with the assistance of his or her employees identifies these hazards through a process known as a Job Hazard Analysis (JHA). There are different ways to perform a JHA. One method is for the supervisor to observe an employee perform the job. Advantages of this method include that it does not rely on individual memory and the observing the process can prompt recognition of hazards. For infrequently performed or new jobs, this method may not be practical.

Another approach is to have a group of experienced employees and supervisors complete the assessment through discussion. An advantage of this method is that more people are involved promoting a more readily acceptable work procedure.

Whichever technique is used, the process may identify previously undetected hazards and increase the job knowledge for those participating. Safety awareness is raised, communication between employees and supervisors is improved, and the acceptance of safe work procedures is promoted.

A JHA, or better still, a written work procedure based on it, becomes a teaching aid for initial job training and a review guide for infrequent jobs. JHAs are required for all jobs, including non-routine work. Update JHAs when introducing a new procedures or material. Appendix 1 addresses the process of conducting a JHA in more detail.

In some cases, employee exposure monitoring or medical surveillance is necessary to determine fully the risk associated with a workplace hazard. EH&S can provide information and support regarding exposure monitoring and medical surveillance. Certain hazards and controls will always require medical surveillance (e.g., exposure to high noise, mandatory use of respirators, etc.).

Other hazards, such as fires and hurricanes, are common to all work areas and employees. The FGCU University Police and the EH&S websites are the primary sources for information on natural hazards and general emergencies (i.e., hurricanes, fires, bomb threats, etc). While the Police and EH&S provide general guidance and procedures to address such hazards, supervisors must supplement this general information with information that is unique to their work area (i.e., specific evacuation routes and shelter-in-place locations, locations of alarms and emergency equipment, hazard assessment for preparation and continuity of operation tasks, etc.).

Training:

Effective training is a critical part of identifying and controlling workplace hazards. Good training informs employees of hazards in the workplace and effective mitigation strategies. A safety-training program consists of the following general components.

- Provide general and work area specific training at time of hire.

- Retraining when the introduction of new materials, processes, or equipment into the workplace creates a hazard for which an employee is not trained; or when new hazards are identified.
- Refresher training, as mandated by specific regulations or supervisor observation.
- Recordkeeping, EH&S maintains training records for all participants in EH&S sponsored training. Departments and/or supervisors must maintain records of work area or task-specific training and other training not delivered or organized by EH&S.

All employees must participate in initial safety training at the time of their hire. At a minimum, this training must include the department IIPP, hazard communication (SDS), emergency response, and life safety. Supervisors must also instruct their employees on how to protect themselves from hazards specific to their job duties and work areas identified as part of the JHA described earlier, or in compliance with federal, state, or local regulations.

Retraining is appropriate when new procedure, materials, or equipment changes render previous training incomplete or after identifying a new workplace hazard. Retraining may also be appropriate when the supervisor observes poor compliance with established safe work practices.

Refresher training is most often required at specific frequency as part of compliance with federal, state, or local agency regulations. For example, annual refresher training is required for employees subject to the blood borne pathogen program.

Inspections:

Routine safety inspections are essential for identifying unsafe conditions. Supervisors are responsible for performing and documenting routine evaluations of their operations for health and safety hazards and non-conformance with regulatory requirements.

When inspection reveals a workplace hazard, halt the related work until a correction is made. At a minimum, conduct inspections at a frequency that ensures expedient identification of potential hazards. Additional inspections are called for with the introduction of new equipment, new processes, or when an accident or near accident occurs.

Department heads are encouraged to conduct and document their own inspections, and department safety committees can be a valuable resource for conducting department-wide safety inspections and providing a second view of deficiencies not recognized by individual supervisors.

EH&S will perform or participate in work-area surveys when requested, but EH&S inspections are not a substitute for supervisor inspections.

Record Keeping and Documentation:

Retain records relating to workplace safety including JHAs, inspection reports, exposure reports, medical surveillance reports, training documentation, accident reports, summaries of investigations, and other records as required by supplemental specific safety or regulatory compliance plans.

Departments are required to maintain those records that they generate. EH&S will maintain records generated through the activities of their office.

Retain results of employee exposure monitoring for thirty years following the exposure. The attending occupational physician maintains medical records. Retain all other records for at least five years, unless a specific standard or regulation requires a longer retention period.

Safety Committees:

In addition to EH&S, various safety committees are active at FGCU to promote injury and illness prevention campus wide.

- Workplace Safety Committee: informs the Provost's Planning and Budget Council on the status of the health and security of the campus community and its physical infrastructure.
- Institutional Review Board - reviews all protocols involving human subjects.
- Institutional Animal Care and Use Committee - reviews the use of live, vertebrate animals.
- Institutional Safety Committee - promotes and facilitates a safe research environment

Department safety committees focus on the specific workplace environment, and should be an important part of each department's IIPP. At the discretion of the department head, safety committee activities may include preparing unit safety plans, organizing safety training, conducting inspections, reviewing department injuries and illnesses, and addressing department-specific safety or compliance concerns.

Injury investigation and Hazard Reporting:

Injured employees must notify their supervisor of their injury as soon as possible. The employee and supervisor must file the Notice of Injury directly with OptaComp at 877-518-2583. If the injury requires medical attention, the OptaComp intake specialist will arrange to send the employee to an authorized hospital or doctor's office. If the employee's injury does not require medical attention, the Notice of Injury must still be filed with OptaComp.

If the injury requires immediate medical attention, call University Police at 911.

As soon as possible, after arranging for medical attention, contact the Benefits & Leave Administrator in Human Resources and advise them of the circumstances of the injury.

In addition to the Notice of Injury report, all injuries require completion of a workplace hazard investigation. The purpose of this investigation is to identify any hazard(s) contributing to the injury, and remove or minimize the risks they present.

The supervisor has the primary responsibility for investigating the hazard with input from his or her Dean, Director, Chair, and other staff. Damaged equipment or other workplace property may warrant a hazard investigation at the supervisor's discretion. Call Environmental Health & Safety at 590-1414 if you have any questions about this form, or for assistance in completing your workplace hazard investigation.

Ideally, you will identify hazards during the JHA and address them before anyone is injured. Report all workplace hazards for evaluation and mitigation if warranted.

Imminent dangers are those safety hazards that pose an immediate threat of personal injury, illness, death, and/or significant damage to University property. Employees recognizing an imminent danger have the authority and responsibility to stop the operation (if under their immediate control), and to notify the affected employees and a supervisor having jurisdiction over the area.

Employees also play a key role in identifying non-imminent hazards and are encouraged to report problems or concerns to their supervisors via a workplace hazard report or near miss report.



Injury and Illness Prevention Program – Appendix 1

Job Hazard Analysis

Document location: www.fgcu.edu/ehs

A job hazard analysis (JHA) is a technique to identify the dangers of specific tasks in order to reduce the risk of injury to workers. Once you know what the hazards are, you can reduce or eliminate them before anyone gets hurt. It takes time to do your JHAs, but it's time well spent. Be sure employees are involved in the process --- they do the work and often know the best ways to work more safely.

Conducting a JHA is important for all tasks and especially for non-routine tasks where it may be the first time performing an activity, or memories have forgotten the lessons learned the last time.

Instructions for Conducting a Job Hazard Analysis:

1. Involve employees.
2. Set priorities.
 - Jobs with the highest injury or illness rates;
 - Jobs where there have been "close calls";
 - Jobs where you have identified violations of OSHA standards;
 - Jobs with the potential to cause serious injuries or illness, even if there is no history of such problems;
3. Break the job task into steps.

EXAMPLE: Changing a flat tire.

Task		
Park vehicle		
Remove spare		
Pry off hub cap and loosen lug nuts.		
And so on.....		

4. Identify the hazards of each step.
 - What can go wrong?
 - What are the consequences?
 - How likely is it that the hazard will occur?

Task	Potential Hazard	
Park vehicle	Vehicle too close to traffic On uneven or soft ground Vehicle may roll.	
Remove spare	Strain from lifting spare.	
Pry off hub cap and loosen lug nuts.	Hub cap may pop off and hit you Lug wrench may slip	
And so on.....	...	

5. Discuss with employees how to eliminate or reduce hazards
 - Be specific - don't use generalizations like "Be Careful"
 - Equipment changes, or engineering controls, such as machine guards, product substitution, or better ventilation are the first choice because they can eliminate the hazard
 - Use administrative controls, such as changing the steps to the job, if engineering controls aren't possible
 - Personal protective equipment is the final option when engineering and administrative controls can't adequately protect workers

Task	Potential Hazard	Prevention
Park vehicle	Vehicle too close to traffic Vehicle on uneven or soft ground Vehicle may roll.	Drive to area well clear of traffic. Turn on emergency flashers Choose a firm, level parking area Apply the parking brake; leave transmission in PARK; place blocks in front and back of the wheel diagonally opposite to the flat

Remove spare	Strain from lifting spare.	Turn spare to upright position in the wheel well. Standing as close as possible, lift spare out of the truck and roll to flat tire.
Pry off hub cap and loosen lug nuts.	Hub cap may pop off and hit you Lug wrench may slip	Pry off hub cap using steady pressure Use proper lug wrench; apply steady pressure slowly.
And so on.....

Once the JHA is completed, communicate the results to all employees who are, or will be, performing that job. The side-by-side format used in JHA worksheets is not an ideal one for instructional purposes. Better results are achieved by creating a written procedure.

For example, the work procedure based on the partial JHA developed in this document might start out like this:

1. Park vehicle.
 - Drive vehicle off the road to an area well clear of traffic, even if it requires rolling on a flat tire. Turn on the emergency flashers to alert passing drivers so that they will not hit you.
 - Choose a firm and level area for parking. You can jack up the vehicle to prevent rolling.
 - Apply the parking brake, leave the transmission in PARK, place blocks in front and back of the wheel diagonally opposite the flat. These actions will also help prevent the vehicle from rolling.
2. Remove spare tire.
 - To avoid back strain, turn the spare up into an upright position in its well. Stand as close to the trunk as possible and slide the spare close to your body. Lift out and roll to flat tire.
3. Pry off hub cap and loosen lug nuts.
 - Pry off hub cap slowly with steady pressure to prevent it from popping off and striking you.
 - Using the proper lug wrench, apply steady pressure slowly to loosen the lug bolts (nuts) so that the wrench will not slip, get lost or and hurt your knuckles.
4. And so on.



Injury and Illness Prevention Program – Appendix 2

Specific Hazardous Work Programs

Document location: www.fgcu.edu/ehs

Specific codes and regulations cover some hazardous work and describe the procedures for the department to follow. For other common hazards, EH&S has prepared guidance documents to assist you in performing the JHA and training your employees. Examples include:

Bloodborne Pathogens

Departments with employees expected to be exposed to blood or other infectious materials must develop a written Exposure Control Plan detailing infection control methods, personal protective equipment, specialized equipment and materials needed.

Confined Space Entry

Entry into workplace spaces that are considered confined because their configurations require evaluation by a competent person prior to entry. A confined space that contains potential health hazards may require implementation of a permit system before entry.

Elevated Work

A fall protection system approved by a competent person is required for all unguarded work above four feet from the next lower level.

Ergonomic Furniture

Employees who work for extended periods at a computer may be at increased risk of injury from poor workstation design. Information on office ergonomics is available at the EH&S website.

Excavation

Excavations or trenches 4 feet or greater in depth must be adequately benched, shored, or sloped as determined by a competent person. Excavations or trenches 20 feet deep or greater must have a protective system designed by a registered professional engineer.

Forklift Use

A competent person must train powered industrial truck (forklift) operators.

Hazardous Waste Cleanup

Cleanup of hazardous wastes, beyond a limited quantity that poses no threat to the safety and health of employees in the immediate vicinity or to the employee cleaning it up, must comply with hazardous waste worker regulations.

Hot Work

Welding, cutting, and allied processes as described in ANSI Z49.1 require a hot work permit in accordance with OSHA 29 CFR 1910.252, 29CFR 1926.352, the Florida Fire Prevention Code 41.3.5, and NFPA 51B.

Laboratory Operations

The *General Laboratory Health and Safety* manual, and the laboratory's *Chemical Hygiene Plan* address the requirements for laboratory work on campus.

Lockout / Tagout

An energy control program (lockout/ tagout) is required where the unexpected energizing, startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated from the energy source and rendered inoperative.

Personal Protective Equipment

Use of some personal protective equipment, especially respirators and hearing protection, requires specific procedures and policies prior to use. EH&S can assist with these programs.

Scaffolding

A competent person must approve scaffolding erection and use.

Accident Data

The data provided is based on the first notice of injury reports completed and submitted to Worker's Compensation. This general information is to inform the campus community of the reportable hazards that occurred here at Florida Gulf Coast University either on or off campus.

If you click [here](#) there are many available resources to help take step in preventing, minimizing or eliminate the hazard or providing an alternative way of working safe at the workplace.

Please note that the data provided reflects only those work-related injuries sustained by employees.

Departments interested in accident data specific please contact FGCU EH&S.