



PIEDMONT
INTERNATIONAL UNIVERSITY

Piedmont International University
SAFETY & HEALTH POLICY

Management Commitment

Safety Policies

Safety Coordinator Responsibilities:

1. Ensure that a Safety Committee is formed and is carrying 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 the safety program.
3. Ensure that incidents are fully investigated and corrective action is taken to prevent the hazardous conditions or behaviors from happening again.
4. Ensure that a record of injuries and illnesses are maintained and posted as described in this program.
5. Set a good example by following established safety rules and attending required training.
6. Report unsafe practices or conditions to the supervisor of the area where the hazard was observed.

Supervisor Responsibilities:

1. Ensure that each employee you supervise is competent or receives on-the-job training on safe operation of equipment or tasks *before* starting work on that equipment, project, or any new work assignment.
2. Ensure that each employee receives required personal protective equipment (PPE) *before* starting to work on a project requiring PPE, and that he/she is trained on any new PPE.
3. Promptly correct any hazards you find on inspections.
4. Set a good example for employees by following safety rules and attending required training.
5. Investigate all incidents in your area and report your findings to management.
6. Inform other employers/subcontractors of our safety/health program requirements prior to commencing work. Inform the Safety Coordinator whenever outside contractors will have employees on site.
7. Talk to management about changes to work practices or equipment that will improve employee safety.

Employee Responsibilities:

1. Follow safety rules described in this program, OSHA safety standards and training you receive.
2. Report unsafe conditions or actions to your supervisor or Safety Committee representative promptly.
3. Report all injuries to your supervisor promptly regardless of how serious.
4. Report all near-miss incidents to your supervisor promptly.
5. Always use personal protective equipment (PPE) in good working condition where it is required.

6. Do not remove or defeat any safety device or safeguard provided for employee protection.
7. Encourage co-workers by your words and example how to use safe work practices on the job.
8. Make suggestions to your supervisor, Safety Committee representative or management about changes you believe will improve employee safety.

Employee Participation

Safety and Health Committee:

We have formed a safety/health committee to help employees and management work together to identify safety problems, develop solutions, review incident reports and evaluate the effectiveness of our safety/health program—all in accordance with NCGS 95-251 and 252. The Safety Coordinator shall facilitate the selection process and all committee activities.

The Safety/Health Committee shall, within reasonable limits and in a reasonable manner, exercise the following rights:

- Review the safety/health program upon establishment and yearly thereafter.
- Review incidents involving work-related fatalities, injuries/illnesses, near-miss incidents and safety/health complaints.
- Review university work injury/illness records (other than personally identifiable medical information), and other reports/documents relating to occupational safety/health.
- Conduct inspections at least quarterly and in response to employee/committee complaints.
- Conduct interviews with employees during inspections.
- Conduct meetings at least quarterly and keep written minutes.
- Observe the measurement of employee exposure to toxic materials and harmful physical agents.
- ♦ A committee member will be designated at each meeting to keep minutes. A copy will be posted on the employee bulletin board after each meeting. After being posted for one month, the minutes will be filed for two years by the Safety Coordinator.

Hazard Recognition

Record Keeping and Review:

Employees are required to report any injury or work-related illness to their immediate supervisor regardless of how serious. Minor injuries such as cuts and scrapes can be entered on the Minor Injury Log post. The employee must use an "Employee's Injury/Illness Report Form" to report more serious injuries.

The supervisor will:

- Investigate a serious injury or illness using procedures in the "Incident Investigation" section below.
- Complete an "Incident Investigation Report" form.
- Give the "Employee's Report" and the "Incident Investigation Report" to **Marc Cutrell, Dean of Student Development.**

Marc Cutrell, Dean of Student Development will:

- Determine from the Employee's Report, Incident Investigation Report, and any claim form associated with the incident, whether it must be recorded on the OSHA 300 Injury and Illness Log and Summary according to the instructions for that form.
- Enter an incident report within seven days after the university becomes aware of it.
- If the injury is not recorded on the OSHA log, add it to a separate incident report log, which is used to record non-OSHA recordable injuries and near misses.
- Before the scheduled Safety Committee meeting, make any new injury reports and investigations available to the Safety Committee for review, along with an updated OSHA and incident report log.

The Safety Committee will review the log for trends and may decide to conduct a separate investigation of any incident.

Marc Cutrell, Dean of Student Development will post a signed copy of the OSHA log summary for the previous year on the safety bulletin board each February 1 until April 30. 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.

Incident Investigations

Incident Investigation Procedure:

If an employee dies while working or is not expected to survive, or when an employee is admitted to a hospital because of a work-related incident, **Wesley Scruggs** will contact the North Carolina Department of Labor-OSH within eight hours after becoming aware of the incident. The toll -free notification number is: 1-800-NCLABOR. **Wesley Scruggs** must talk with a representative of the department. **Wesley Scruggs** must report: the employer name, location and time of the incident, number of employees involved, the extent of injuries or illness, a brief description of what happened and the name and phone number of a contact person.

- **DO NOT DISTURB the scene except to aid in rescue or make the scene safe.**

Whenever there is an incident that results in death or serious injuries that have immediate symptoms, a preliminary investigation will be conducted by the Dean of Student Development, the immediate supervisor of the injured person(s), a person designated by management, an employee representative of the Safety Committee, and any other persons whose expertise would help the investigation.

The investigation team will take written statements from witnesses, photograph the incident scene and equipment involved, documenting them as soon as possible after the incident. The team will make a written "Incident Investigation Report" of its findings. The report will include a sequence of events leading up to the incident, conclusions about the incident and any recommendations to prevent a similar incident in the future. The report will be reviewed by the Safety Committee at its next regularly scheduled meeting.

When a supervisor becomes aware of an employee injury where the injury was not serious enough to warrant a team investigation as described above, the supervisor will complete an "Incident Investigation Report" and "Employee's Injury/Illness Report Form" and forward them to Marc Cutrell, Dean of Student Development.

Whenever there is an incident that did not but could have resulted in serious injury to an employee (a near-miss), the incident will be investigated by the supervisor or a team depending on the seriousness of the injury that would have occurred. The "Incident Investigation Report" form will be used to investigate the near-miss. The form will be clearly marked to indicate that it was a near miss and that no actual injury occurred. The report will be forwarded to Marc Cutrell, Dean of Student Development to record on the incident log.

Safety Inspection Procedure:

Piedmont International University is committed to actively identifying hazardous conditions and practices which are likely to result in injury or illness to employees. We will take prompt action to eliminate any hazards we find. In addition to reviewing injury records and investigating incidents for their causes, management and the Safety Committee will regularly check the workplace for hazards as described below:

Annual Site Survey & Audit -- Once a year an inspection team designated by the Dean of Student Development will do a wall-to-wall walk through inspection of the entire worksite. They will write down any safety hazards or potential hazards they find. The results of this inspection will be used to eliminate or control obvious hazards, target specific work areas for more intensive investigation, assist in revising the checklists used during regular quarterly safety inspections and as part of the annual review of the effectiveness of our accident prevention program. All written programs will be reviewed and a written statement of findings and remedial actions shall be kept for two years.

Periodic Change Survey – The Safety Coordinator (Dean of Student Development) will look at any changes we make to identify safety issues. Changes include new equipment, new PPE, changes to production processes or any changes to the building structure. A team is made up of maintenance, production, and Safety Committee representatives. It examines the changed conditions and makes recommendations to eliminate or control any hazards that were or may be created as a result of the change.

Quarterly Safety Inspection -- Each quarter, before the regularly scheduled Safety Committee meeting, Safety Committee representatives will inspect their areas for hazards. They will talk to co-workers about their safety concerns. Committee members will report any hazards or concerns to the whole committee for consideration. The results of the area inspection and any action taken will be posted in the affected area for one month and a copy filed for two years. Occasionally, committee representatives 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 -- As a part of our on-going safety program, we will use a "Job Hazard Analysis" form to look at each type of job task our employees do. This analysis will be done by the supervisor of that job task with the Safety Coordinator and/or a member of the Safety Committee. We will change how the job is done as needed to eliminate or control any hazards. We will also check to see if the employee needs to use personal protective equipment (PPE) while doing the job. Employees will be trained in the revised operation and to use any required PPE. The results will be reported to the Safety Committee. Each job task will be analyzed at least once every two years, whenever there is a change in how the task is done or if there is a serious injury while doing the task.

Hazard Prevention Control

Eliminating Workplace Hazards:

Piedmont International University is committed to eliminating or controlling workplace hazards that could cause injury or illness to our employees. We will meet the requirements of state safety standards where there are specific rules about a hazard or potential hazard in our workplace. Whenever possible we will design our facilities and equipment to eliminate employee exposure to hazards. Where these engineering controls are not possible, we will write work rules that effectively prevent employee exposure to the hazard. When the above methods of control are not possible or are not fully effective we will require employees to use personal protective equipment (PPE) such as safety glasses, hearing protection, foot protection etc.

Basic Safety Rules:

The following basic safety rules have been established to help make our university a safe and efficient place to work. These rules are in addition to safety rules that must be followed when doing particular jobs or operating certain equipment. Those rules are listed elsewhere in this program. Failure to comply with these rules will result in disciplinary action.

- Never do anything that is unsafe in order to get the job done. If a job is unsafe, report it to your supervisor or Safety Committee representative. We will find a safer way to do that job.

- Do not remove or disable any safety device! Keep guards in place at all times on operating machinery.
- Never operate a piece of equipment unless you have been trained and are authorized.
- Use your personal protective equipment whenever it is required.
- Obey all safety warning signs.
- Working under the influence of alcohol or illegal drugs or using them at work is prohibited.
- Do not bring firearms or explosives onto university property.
- NO SMOKING is only permitted outside the building away from any entry or ventilation intake.
- Horseplay, running and fighting are prohibited
- Loose clothing, jewelry and hair longer than shoulder length shall not be worn around moving machinery.
- Clean up spills immediately. Replace all tools and supplies after use. Do not allow scraps to accumulate where they will become a hazard. Custodial Services helps prevent injuries.

Job Related Safety:

We have established safety rules and personal protective equipment (PPE) requirements based upon a hazard assessment for each task listed below:

Work in or pass through any production area:

Required PPE:

- Safety glasses. Check prior to use for broken or missing components (such as side shields) and for scratched lenses. Safety glasses must have a "Z87.1" marking on the frame. If they are prescription glasses, the initials of the lens manufacturer must be stamped into the corner of the lens to show that they are safety glass lenses.

Work Rules:

1. Walk within marked aisles.
2. Do not distract or talk with employees when they are using a machine.

Work with Bench Grinders: Machine shop

Required PPE:

- Eye protection (full-face shield with safety glasses under the shield).

Work Rules:

1. Check that there is a gap between the tool rest and the wheel of no more than 1/8".
2. Check that the upper wheel (tongue) guard has a gap of no more than 1/4".
3. Check that the wheel edge is not excessively grooved. Dress the wheel if necessary.

4. Do not grind on the face of the wheel.

Work with Ladders: All locations

Required PPE:

- Before working greater than 25', a full body harness is required. Approval must be obtained from Marc Cutrell, Dean of Student Development. Alternate options: utilizing vendors for safety.

Work Rules:

1. Before you use a ladder check it for defects such as loose joints, grease on steps, or missing rubber feet.
2. Do not paint a ladder! You may hide a defect.
3. Do not use a ladder as a brace, workbench or for any other purpose than climbing.
4. Do not carry objects up or down a ladder if it will prevent you from using both hands to climb.
5. Always face the ladder when climbing up or down.
6. If you must place a ladder at a doorway, barricade the door to prevent its use and post a sign.
7. Only one person is allowed on a ladder at a time.
8. Always keep both feet on the ladder rungs except while climbing up or down. Do not step sideways from an unsecured ladder onto another object.
9. If you use a ladder to get to a roof or platform, the ladder must extend at least 3' above the landing and be secured at the top and bottom.
10. Do not lean a step ladder against a wall and use it as a single ladder. Always unfold the ladder and lock the spreaders.
11. Do not stand on the top step of a step ladder or the step immediately below.
12. Set a single or extension ladder with the base $\frac{1}{4}$ of the working ladder length away from the support.

Lifting Tasks: All locations

Required PPE:

- Leather gloves – for sharp objects or surfaces (employer provided)

Work Rules:

1. Do not lift on slippery surfaces.
2. Test the load before lifting.
3. Get help if the load is too heavy or awkward to lift alone.
4. Break the load down into smaller components if possible to provide a comfortable lift.
5. Do not overexert!
6. Make sure you have a good handhold on the load.

7. Do not jerk the load or speed up. Lift the load in a smooth and controlled manner.
8. Do not twist while lifting (especially with a heavy load). Turn and take a step.
9. Keep the load close to the body. Walk as close as possible to the load. Pull the load towards you before lifting.
10. Avoid long forward reaches to lift over an obstruction.
11. Avoid bending your back backwards to lift or place items above your shoulder. Use a step stool or platform
12. Do not lift while in an awkward position.
13. Back injury claims are painful for the worker and expensive for the university. Do not lift with your back, lift with your legs.

Disciplinary Policy:

Employees are expected to use good judgment when doing their work and to follow established safety rules. We have established a disciplinary policy to provide appropriate consequences for failure to follow safety rules. This policy is designed not so much to punish as to bring unacceptable behavior to the employee's attention in a way that the employee will be motivated to make corrections. The following consequences apply to the violation of the same/similar rule or the same/similar unacceptable behavior:

First Instance -- Verbal warning, notation in employee file, and instruction on proper actions

Second Instance -- Written reprimand, and instruction on proper actions

Third Instance -- To be determined by appropriate management

Fourth Instance -- Termination of employment.

An employee may be subject to immediate termination when a safety violation places the employee or co-workers at risk of permanent disability or death.

*******Emergency Planning: See PIU'S Emergency Preparedness Manual**

If an injury occurs:

- A first aid kit is kept Deeds Second Floor Bathroom. Triage area is located Deeds, on the second floor, outside the Business Office (near the stairwell) If you are injured, promptly report it to any supervisor.
- Supervisors and other employees may be first-aid/CPR certified. A list of current first aid and CPR certified supervisors and employees are posted on the safety bulletin board along with the expiration dates of their cards.
- **In case of serious injury, do not move the injured person unless absolutely necessary. Only aid the level of your training and authorization. Call for help. If there is no response, call 911.**

- Aids/HIV and Hepatitis B are the primary infectious diseases of concern in blood. *All blood should be assumed to be infectious.* These diseases can both be deadly. Employees are *not* required to perform first aid as part of their job duties. In the event of a bleeding injury where first aid is needed, use gloves if possible to prevent exposure to blood or other potentially infectious materials. The injured person can often help by applying pressure to the wound. Gloves and a mouth barrier for rescue breathing are available in the first aid kits. If you are exposed to blood while giving first aid wash immediately with soap and water and report the incident to a supervisor. The supervisor must complete an incident report and notify Marc Cutrell, Student of Development The appropriate follow-up procedures will be initiated.

Safety and Health Training and Education

Safety Training:

Training is an essential part of our plan to provide a safe work place at *Piedmont International University*. To ensure that all employees are trained *before* they start a task that requires training, we have a Safety Coordinator whose name is posted on the safety bulletin board. Marc Cutrell, the Safety Coordinator is responsible to verify that each employee has received an initial orientation (plus retraining whenever new hazards, chemicals, tasks or PPE are introduced) by his/her supervisor, has received any training needed to do the job safely, and that the employee file documents the training. The Safety Coordinator will make sure that an outline and materials list is available for each training course we provide and that written compliance plans are in place and current:

<u>Course</u>	<u>Who must attend*</u>
Basic Orientation	All employees.
Safe Lifting	Any employee applicable.
Chemical Hazards (General)	All employees.
Chemical Hazards (Specific)	An employee who uses or is exposed to particular chemicals.
Fire extinguisher safety	All staff employees
Respirator Training	Employees who use a respirator.
PPE Training	Employees who use PPE (e.g., safety glasses, safety-toe shoes).
Hearing Conservation (noise)	Employees exposed to >85 decibels.
Electrical Safe Work Practices	Employees who work on energized (live) circuits/equipment.

Chemical Hygiene Plan	Employees who work in laboratories.
Bloodborne Pathogens	Employees potentially exposed to BBP, medical staff, and emergency responders.
Process Safety Management	All employees.
Life Safety Code (1991 ed.)	All employees.
Evacuation/Means of Egress	All employees.
Ladder Safety	Employees who use ladders.
Machine Guarding	All employees.
Accident/Incident Investigation	Safety/Health Committee, Supervisors.
Hazard Identification/Surveys	Safety/Health Committee, Supervisors.
Rights/Responsibilities	Safety/Health Committee, Supervisors, Management.
Recordkeeping	Safety/Health Committee, Supervisors, Management.
Common on-the-job accidents	Safety/Health Committee, Supervisors.
Common safety violations	Safety/Health Committee, Supervisors.

*Note: Safety/Health Committee members must be trained, based upon the scope of the committee's duties.