



LANSING COMMUNITY COLLEGE

Occupational and Environmental Safety Program Framework

This document provides the framework for developing, implementing, and maintaining a comprehensive occupational and environmental safety program at LCC. Specifically, the document details the safety control measures the college has implemented to protect employees, students, visitors, volunteers, contractors, and vendors. LCC’s framework conforms to Safety and Health Management System Guidelines (MIOSHA SP#2) and, Lansing Community College Board of Trustees Policy 6.090.

Occupational and Environmental Safety Department, Administrative Services Division

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SAFETY AT LANSING COMMUNITY COLLEGE

Introduction

A workplace with a positive safety culture is one in which all employees think of safety as an important part of their job and behave in a way that prioritizes their safety and the safety of those around them. This includes using proper personal protection equipment, following the safety rules, and being generally conscious of safety and safe practices at all times.

A workplace with a positive safety culture is one where leaders are aware of the state of training, physical condition, and morale of their students and employees. They are in a critical position to influence safe behavior and prevent incidents before they happen.

The key elements to creating a culture of comprehensive Occupational and Environmental Safety (OES) at LCC begin with a commitment to safety as a core value in management decision-making, a focus by all regarding what can be done to prevent injuries in their areas, involvement by employees in identifying and correcting hazards, and an expectation that problems raised will receive prompt action by leadership. To be most effective, an OES must be balanced with and incorporated into college core business processes.

Goals

The goals of LCC's Occupational and Environmental Safety Program are:

- To create a college-wide comprehensive culture of safety
- To ensure college-wide involvement in developing, implementing, and maintaining safety programs (i.e., every department, every employee)
- To develop and implement practical and sustainable processes and procedures
- To eliminate or mitigate hazards and prevent incidents

Authorities

The Michigan Occupational Safety and Health Administration (MIOSHA) strives to work collaboratively with employers and employees to better prevent workplace injuries, illnesses, and fatalities. All agency activities focus on meeting the MIOSHA mission to help protect the safety and health of Michigan workers.

Department of Environment, Great Lakes, and Energy (EGLE) protect Michigan's environment and public health by managing air, water, land, and energy resources.

RESPONSIBILITIES

Executive Leadership Team (ELT)

- Responsible for the implementation and sustainability of occupational and environmental safety programs, procedures, and processes to protect students in instructional environments and employees in the workplace

- Ensures supervisors have the authority to act to protect the safety of employees, students, visitors, volunteers, contractors, and vendors as assigned within their divisions, departments, or programs
- Provide adequate financial resources and personnel to maintain a safe work environment and instructional spaces
- Review safety programs with supervisors at least annually

Director of Occupational and Environmental Safety (OES)

- Develop college-wide OES programs to meet the requirements of MIOSHA and EGLE
- Provides subject matter expertise and technical resources and training to ELT members and supervisors designed to protect LCC's students and employees
- Act as a liaison with local, state, and federal regulatory agencies

Supervisor/Program Safety Manager (PSM)

All supervisors are PSMs and are charged with leading their divisions, departments, or programs in complying with state and local regulatory occupational, environmental, and safety (OES) requirements, under the direction of their Executive Leadership Team (ELT) member.

Specifically, Supervisors will:

- **AREA OES PROGRAM** - Ensure that all hazard controls, rules, regulations, and procedures are identified, implemented, and enforced in all areas under their span of control.
- **AUTHORITY** - Have the responsibility and authority to take immediate corrective action to eliminate hazardous conditions and practices.
- **COLLABORATION** - Conduct hazard surveys with employees by working collaboratively with employees to establish and implement OES programs and procedures that align with state and local regulatory OES requirements.
- **HAZARD AWARENESS** - Ensure that students and employees are properly informed of potential hazards within the instructional environments or workplaces and know how to maintain their safety
- **OES TRAINING** - Develop and provide division, department, or program-specific OES training.
- **INCIDENT REPORTING** - Conduct timely OES investigations and document incidents involving injuries, accidents, near misses, and hazardous conditions, and report as required.
- **LEADERSHIP COMMUNICATION** - Keep ELT members and the Director of OES informed of material OES-related hazards, concerns, and challenges
- **PROGRAM COMPLIANCE** - Ensure inspections are consistently conducted and documented to include the timely correction or mitigation of hazards found
- **DOCUMENTATION** - Create, maintain, and provide all required documents (safety plans, chemical inventories, work procedures, safety data sheets, training, etc.)
- **CHANGE MANAGEMENT** - Ensure new equipment, products, and procedures are assessed for recognized safety, health, and environmental hazards and implement appropriate controls before use or implementation
- **SAFETY COMMITTEE** - Coordinate, lead, and regularly attend division, department, or program safety committee meetings

Faculty

Faculty members play a key role in creating and maintaining a culture of safety for students. They must ensure that their instructional spaces are safe and free of recognized hazards and ensure safety procedures are consistently practiced. Faculty need to follow the employee role as well as their primary faculty role and responsibility to students

Specifically, faculty members will:

- Train and enforce safety procedures and the appropriate use of Personal Protective Equipment (PPE).
- Maintain safe instructional spaces such as keeping areas clear of slips, trips, and fall hazards.
- Take immediate corrective action to eliminate hazardous conditions and practices
- Ensure that instructional supplies, materials, and equipment are maintained, used, and properly stored.
- Ensure timely reporting of all injuries, accidents, near misses, and hazardous conditions as well as assisting in the investigation of incidents occurring within their classroom, lab, or activity.

Students

Students are responsible for their safety and actions. They are also responsible for completing training as required, following applicable safety procedures, wearing required PPE, and reporting all injuries, accidents, near misses, and hazardous conditions to their instructor.

Employees

Employees are responsible for their safety and actions. They are responsible for completing training as required, following applicable safety procedures, wearing required PPE, and reporting all injuries, accidents, near misses, and hazardous conditions to their supervisor. Employees are also expected to participate in the development of safety procedures and methods of protecting the environment through their involvement with safety committees or other means of providing feedback to the college.

Vendors and Contractors

Divisions, departments, or programs using vendors and contractors must designate an employee to interact with vendors and contractors to ensure relative information is exchanged and exposures to the public and LCC employees are minimized or eliminated.

Vendors and contractors are responsible for taking all steps necessary to establish, administer, and enforce health and safety rules and regulations as established by MIOSHA and EGLE.

EMPLOYEE INVOLVEMENT

Introduction

All employees contribute to the safety culture at LCC. As such, the college encourages and supports employee participation and involvement in LCC's OES programs. Employee involvement can occur in several ways, such as:

- Being a participant on a safety committee,

- Reporting injuries, illnesses, accidents, near misses, and hazardous conditions promptly,
- Making suggestions regarding safety programs, plans, practices, training topics, and ways of preventing and controlling hazards, etc.,
- Keeping themselves and others safe by following safety procedures, using the appropriate PPE and
- Completing training as required.

Safety Committees

Safety committees will be led by supervisors with designated representatives from each of the labor units.

The committees shall:

- Meet regularly.
- Be accessible to all employees.
- Keep minutes of each meeting, including records of safety issues discussed.
- When necessary, review results of program safety inspections to identify any needed safety procedures and practices and to track specific corrective actions.
- When necessary, review incident investigation reports to ensure that all causes have been identified and corrected.
- Where appropriate, submit suggestions to the administration for the prevention of future incidents.
- Review hazardous conditions reported to any committee member and recommend corrective actions.
- Assist supervisors in the evaluation of hazards and safety suggestions submitted by employees and students.
- Conduct workplace safety inspections with supervisors and assist with corrective actions.

Workplace Safety Inspections

Inspections of LCC facilities, equipment, and PPE are the responsibility of all employees. Regular inspections help to ensure the safety of employees and students. In addition, supervisors are required to conduct workplace inspections regularly ensuring facilities, equipment, and PPE are properly maintained. The frequency and type of inspection depend on the nature of operations and associated hazards. The following list contains examples of areas that may need inspections:

- Office, classrooms, and general areas weekly or monthly depending on hazards present.
- Labs, shops, and areas with high hazards or frequently changing operations (forklifts, moving equipment, hazardous waste storage, etc.) as conditions warrant, but not less than weekly.
- In addition, a daily walk-around for areas with high hazards or frequent changing operations (forklifts, machinery, etc.).
- Equipment, instruments, tools, and machinery before each use by the user. In addition, employees must ensure that periodic inspections and preventive maintenance are conducted and that the equipment operates to the manufacturer's specifications. Malfunctioning equipment must be tagged and taken out of service for repair.

- Before using new equipment or chemicals, or before starting a new task or procedure, the supervisor must ensure all hazards have been identified and mitigated.
- Facilities personnel are responsible for inspections of general facilities such as parking lots, stairs, mechanical rooms, etc.

A site-specific inspection checklist shall be developed by the supervisor for different areas of their divisions, departments, or programs.

Findings and corrective actions may also be shared with ELT members, other supervisors, safety committees, and the Director of OES for review.

HAZARD IDENTIFICATION

Introduction

Supervisors will conduct an initial worksite hazard identification to recognize and understand the hazards and potential hazards of their division, department, or program. Identifying hazards is a continual process that extends beyond the initial assessment. Listed below are some ways to help identify hazards in the workplace. This list can also be used to create an inventory of potential hazards:

- Identify existing safety guidelines and procedures
- Inspections
- Hazard assessments and PPE Identification
- Investigate incidents
- New equipment, tasks, or chemical
- Identify interim control measures, and prioritize the hazards for control

Identify existing safety guidelines and procedures

Supervisors will identify equipment and processes that require safety guidelines, procedures, or PPE. They will also review any information that employees may have at their workplace (equipment manuals, safety data sheets, OSHA data, etc.) to find hazards that have already been identified. Additionally, they will observe signage, and review chemical inventories, work instructions or standard operation procedures, and any other available work procedures.

Inspections

The supervisors and employees will inspect the equipment and the surrounding work areas. A thorough safety inspection must be conducted regularly by supervisors and employees. Employee participation in inspections and involvement in hazard identification are important to get buy-in from employees. The frequency of inspections depends on the nature of the operation and its degree of hazards. These inspections can help identify hazards, damaged equipment, or other important safety concerns.

Hazard Assessment and PPE Identification

The purpose of conducting hazard assessments is to prevent incidents by identifying, anticipating, and eliminating hazards. Supervisors, faculty, and employees will conduct initial hazard assessments to ensure the appropriate safeguards and protection are in place and to develop safe work practices and procedures. When hazard and PPE assessments are performed, employees will be involved in the process. This helps to ensure employees are involved in the assessment and identification of hazards.

PPE should be regarded as a last resort to protect students' and employees' health and safety; engineering controls and safety procedures should be considered and implemented first, and then PPE is considered if there is still a risk of hazard.

Investigate Incidents - Injury, Near Miss, and Hazardous Conditions Reports

Employees play a key role in identifying, controlling, and reporting injuries, near misses, and hazardous conditions that may occur or already exist. Employee reports of injuries, near misses, and hazardous conditions can be an effective tool to trigger a closer look at a piece of equipment, the facility, or how work is being performed.

Supervisors report all injuries, accidents, near misses, and hazardous conditions. Completing injury reports for injuries, near misses, and hazardous conditions helps determine the "root cause" to prevent future occurrences. Injury reports can help determine injury and illness trends over time so that patterns with common causes can be identified and prevented. Injury reporting is not intended to place blame. There may be disciplinary action taken if someone causes an incident through horseplay, "playing a joke" or even neglect.

New Equipment, Tasks, or Chemicals

Supervisors will analyze new facilities, equipment, tasks, chemicals, and materials for hazards and potential hazards before being introduced into the workplace or educational environment. Findings will be documented, and plans developed to control or eliminate the hazards. If controls are used, supervisors will ensure all affected students and employees are trained on the new equipment, tasks, or chemicals for hazards and potential hazards.

Identify interim control measures, and prioritize the hazards for control

Supervisors will assess and understand the hazards identified and the types of incidents that could result from exposure to those hazards. This information can be used to develop interim controls and to prioritize hazards for permanent control. They will evaluate each hazard by considering the severity of potential outcomes, the likelihood that an event or exposure will occur, and the number of students and employees who might be exposed. Interim control measures must be used to protect students and employees until more permanent solutions can be implemented. Hazards are prioritized so that those presenting the greatest risk are addressed first.

HAZARD PREVENTION AND CONTROL

Introduction

Supervisors will develop and implement systems to eliminate, prevent, and control hazards. These include the establishment of controls through substitution, engineering, administration, and PPE. PPE should be regarded as a last resort to protect students' and employees' health and safety. Hazard elimination provides the best means of protection for student's and employee's health and safety. Engineering and administrative controls should be considered and implemented next, and then PPE considered if there is still a risk of hazard. PPE devices should not be relied on alone to protect against hazards but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

Correction of hazards found in the workplace is the responsibility of the supervisors. Identified hazards should be shared with employees, the safety committee, ELT, and other supervisors as there may be similar hazardous situations in other areas. Listed below are some ways to eliminate, prevent, or control hazards in our workplace:

- Identify and select controls
- Division, Department, or Program Specific Safety Programs and Procedures



Identify and select controls

Supervisors will identify ways to eliminate or control all serious hazards immediately. Interim controls need to be used while long-term solutions are developed and implemented.

After collecting hazard information, supervisors will organize and review information with employees to determine what types of hazards may be present and which employees may be exposed or potentially exposed. They will gather input from employees who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes. Supervisors will always seek to eliminate hazards wherever possible.

Supervisors will select controls according to the hierarchy of controls that emphasizes engineering solutions (including elimination or substitution) first, followed by safe work practices, administrative controls, and finally use of personal protective equipment. Selecting controls that may directly or indirectly introduce new hazards will be avoided. They will review and discuss control options with employees to ensure that controls are feasible and effective and use a combination of control options when no single method fully protects employees.

Division, Department, or Program-Specific Safety Programs and Procedures

ELT members are responsible for ensuring major safety decisions and required state and local regulatory OES programs are implemented and followed. Written safety rules will be posted and communicated with all employees by their supervisors. Rules need to be enforced and consistently followed.

Safety programs required by MIOSHA and EGLE will be put in writing by LCC OES Department and be available on the college OES website, such as:

- Injury and Illness Reporting
- Lock-out tag-out
- Hazard Communication, Right-to-Know
- PPE assessment and certification
- Permit Required Confined space
- Bloodborne pathogens
- Power Industrial equipment
- Respiratory Protection
- Hearing Conservation
- Fire Prevention
- Hazardous and Regulated Waste

Supervisors must identify which safety programs apply to their division, department, or program and implement the different elements of those programs that apply to them. Supervisors must develop program-specific safety procedures and guidelines to ensure adherence to OES requirements.

TRAINING

Introduction

Supervisors are responsible for ensuring that students and employees receive adequate training on hazards associated with their tasks and protective measures.

Each division, department, or program is responsible for developing and providing department-specific safety orientation training for each new student or employee. Additional training must also be provided as required for specific tasks and, depending on the task may be required before the student or employee is permitted to begin work. These tasks include those that involve the use of PPE, chemicals, machinery, equipment, and tools. Training also includes tasks that may expose students and employees to physical hazards such as elevated work, hot work, electricity, or other hazards.

Training will be a combination of lectures, discussion, interactive computer learning (LMS), written materials, practical training, testing, or one-on-one (on-the-job) training. Additional specialized training may be needed depending on the hazard and tasks.

Training schedules will follow, at a minimum, the training requirements of state and local regulatory OES requirements.

Training is required

- For newly hired and current employees
- When required by specific standards, equipment, or procedure
- When new methods are developed or changed
- When an employee's responsibilities or designated job duties change
- When a pattern of unsafe or unhealthy behaviors is observed

- When new hazards are identified
- When new controls are implemented
- When PPE is provided

Records

Training records will be maintained in two ways. First, Human Resources will maintain any training done in the LMS system. Second, supervisors and faculty members will maintain their division, department, or program-specific required training records.

Training documents will include who was trained, the training subject, who conducted the training, the content, and the date.

Training Topics

Students and employees shall be given safety orientation training before beginning any job assignments. The safety orientation should include general information about hazards they are exposed to, emergency response procedures, how to report injuries, how to obtain emergency assistance, and how to get additional safety information.

Additional training may be required by specific state and local regulatory OES requirements before an employee is assigned to perform tasks covered under the standard.

Training requirements are based on job requirements and exposure to hazards. Supervisors will determine employee training needs and ensure the employee training is completed and documented.

Training for Supervisors

Supervisors will receive training on understanding and performing their OES responsibilities effectively.

Training topics may include:

- Safety responsibilities
- Injury and illness reporting
- PPE and hazard assessment
- Conducting inspections

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