

From Alan Gilbert Senior Vice President for Finance and Administration

March 30, 2023

Dear Colleagues:

We are a busy campus. Every day, students, staff and faculty engage in a broad range of academic and research activities. Our operations, maintenance and support services staff work long hours to keep our campus beautiful and well-maintained. Integral to these pursuits is Brooklyn College's commitment to providing a safe, healthy, and sustainable campus environment.

Everyone shares in this obligation. All members of the College community are expected to be thoroughly familiar with their safety responsibilities, follow safety practices at all times, act proactively to prevent accidents and injuries, communicate hazards to supervisors, and be prepared for emergencies that may occur in the workplace or elsewhere on campus. It is our objective to create a collaborative safety culture among all stakeholders which

- Strives towards excellence in protecting the safety and health of students, faculty, staff, visitors, and the surrounding community and minimizing our environmental impact.
- Integrates safety into all operations, research, construction, operations and maintenance, and evaluation of performance.
- Values environmental health and safety education and training for employees and students.
- Establishes a means to report and recognize safety concerns without reprisal.
- Provides appropriate and timely information in response to questions or concerns about environmental health and safety.
- Establishing programs to support a strong safety culture and to incorporate means for continuous improvement.

The results of a recent audit by CUNY Central Office of Environment, Safety, Health and Risk Management demonstrate that, together, we can achieve compliance in this area. I believe that we can not only comply, Brooklyn College can be a real leader in environmental stewardship and workplace safety.

Thank you for your full cooperation and ongoing effort to reach this goal.

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I. POLICY and GOALS

Brooklyn College is committed to providing a healthful and safe environment for students, staff, faculty, and visitors of the City University of New York (CUNY) Brooklyn College.

The health and safety of all students, staff, faculty, and visitors shall guide the planning and conduct of all College activities and programs, and be a primary consideration in the design, construction, modification, or renovation of all buildings and facilities.

This broad policy requires that all Federal, State and local health and safety regulations, as well as appropriate consensus standards of recognized organizations, and CUNY specific policies are met.

CUNY Brooklyn College makes all reasonable effort to:

- Protect the health and safety of faculty, staff, and students;
- Provide safe workplaces (e.g., academic, research, administrative) for faculty, staff, and students;
- Provide information to faculty, staff, and students about health and safety hazards;
- Identify and correct health and safety hazards and encourage faculty, staff, students to report hazards;
- Provide information and safeguards for those on campus and in the surrounding community regarding environmental hazards arising from operations at Brooklyn College.

II. PROGRAM ELEMENTS

The Injury and Illness Prevention Program (IIPP) describes specific requirements for program responsibility compliance, communication, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping.

III. ROLES AND RESPONSIBILITIES

Brooklyn College is responsible for providing a safe and healthy space for its students, faculty, and staff. The ultimate responsibility for Brooklyn College’s IIPP rests with the President and the Senior Vice President (SVP) of Finance and Administration of Brooklyn College. The President and SVP have the authority and responsibility for ensuring the IIPP and related policies and practices are implemented and provide the necessary resources to ensure program compliance and effectiveness.

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Program Administration The Director of the Office of Environmental Health and Safety (EHS) serves as the Program Administrator with the office responsible for overseeing the program. Responsibilities include:

- Consultation: Advise senior management on health and safety issues, and collaborate with senior leadership to develop safety and health guidelines and policies.
- Oversight: Develop programs, training, procedures, guidance to support the implementation of the IIPP.
- Technical Assistance: Conduct workplace hazard assessments to identify, evaluate, and correct hazards;
- Review: Annually review IIPP and evaluate the overall effectiveness of the IIPP;
- Evaluate: the adequacy and consistency of training designed by schools, departments.
- Resource Allocation: Assist in identification of resource needs to address documented safety deficiencies.

Department Heads, Chairs, and Managers are responsible for ensuring that individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs; Areas under their management have adequate funding for health and safety programs, practices, and equipment; Areas under their management are in compliance with Brooklyn College’s health and safety practices, policies, and programs.

Supervisors and Lead Personnel are responsible for the implementation of the Brooklyn College IIPP. This includes: Ensuring that workplaces and equipment are safe, well maintained, and in compliance with external agency regulations and Brooklyn College policies, programs, and practices; Ensuring that workplace safety and health practices and procedures are clearly communicated and understood by employees through training programs; Enforcing health and safety rules fairly and uniformly relating to job performance; Evaluating employees on compliance with safe work practices; Acknowledging employees who make a significant contribution to maintenance of a safe workplace and disciplining employees who fail to follow safe work practices; Encouraging employees to report workplace hazards without fear of reprisals; Ensuring that periodic, scheduled workplace inspections are conducted and that identified health and safety deficiencies are corrected in a timely fashion; Ensuring that workplace incidents (injuries, exposures, or illnesses) are reported, investigated, and corrected promptly; Ensuring that inspections/investigations and employee health and safety records are kept for the designated period(s) of time.

Employees are responsible for following the requirements of the IIPP. This involves: Keeping themselves informed of conditions affecting their health and safety; Participating in training programs as required; Adhering to healthy and safe practices in their workplace; Promptly reporting to their supervisors of potential hazards in the workplace and workplace incidents (injuries, exposures, or illnesses).

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Contractors and Vendors must have their own IIPP and meet all applicable regulatory requirements. They must also participate in college health and safety activities as required by contracts and/or purchase orders.

College Aides and Student Officers must adhere to the provisions of the IIPP and report unsafe activities and conditions to management, participate in safety training, and other related activities as required.

Visitors and Guests must comply with the college health and safety requirements and participate in IIPP activities if required.

Campus Safety and Health Committee, under the SVP Office of Finance and Administration, has broad representation from both academic and programmatic activities. The Committee fosters the implementation of health and safety programs through facilitated coordination across campus, reviewing of injuries and illnesses trends, and advising EHS on injury and illness prevention policies and procedures.

IV. ACCOUNTABILITY and COMPLIANCE

CUNY Brooklyn College shall ensure compliance with health and safety policies, programs, and procedures. Violations may result in disciplinary measures in accordance with relevant college laws and bylaws, personnel rules and regulations, and student disciplinary procedures.

Managers and supervisors bear special responsibility for establishing and maintaining good health and safety practices in their functional areas. To ensure compliance:

- Employees are encouraged to be active participants in their own safety and health and that of others on campus through reporting of hazardous conditions or behaviors.
- Employees are recognized for following safe and healthful work practices (e.g., oral acknowledgments at meetings, etc.).
- Employees are trained and retrained, as necessary or as required.
- Health and safety practices are integrated into new employee job descriptions and performance appraisals.
- Disciplinary actions with employees for failure to follow safe and healthful work practices are taken, when appropriate.
- An anti-reprisal policy for employees reporting safety and health concerns is enforced.

V. COMMUNICATIONS and EMPLOYEE INVOLVEMENT

CUNY Brooklyn College communicates with employees in a form readily understandable by all affected employees on matters related to occupational safety and health, including provisions designed to encourage employees to inform their supervisors of hazards at the worksite

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without fear of reprisal. The various communication systems Brooklyn College uses to relay information to all employees on matters relating to occupational safety and health, include:

Health and safety publications are available from Environmental Health and Safety via blackboard. Call the office (718) 951-5400 to request copies.

Health and safety meetings at the school, department or unit level are conducted to reinforce important concepts including, but not limited to the following:

- Clearly communicate health and safety programs and procedures.
- Encourage the reporting of workplace hazards to management without fear of reprisal.
- Encourage employees and students to report workplace incidents.

Campus Health and Safety Committee

- Representatives of the deans of each school and administrative programs (e.g., Facilities Planning and Operations, Campus Safety and Community Services).
- Communicate with respective departments about health and safety matters or to ensure the implementation of applicable EHS programs.
- Meet regularly to discuss campus-wide safety issues and to share safety concerns with EHS.
- Reviews injury and illness data and identify potential mitigating steps.

Research Compliance Committees

- Assure the institution's compliance with federal regulations regarding research activities by reviewing those research activities which involve the use of human subjects, laboratory animals, biohazardous agents, recombinant DNA or radiological hazards.

Anonymous and confidential hazard reporting

- To report a hazard or share a health and safety concern, employees may call (718) 951-5400 or email EHS@brooklyn.cuny.edu to submit a concern.
 - Hazard reporting may be done anonymously or confidentially.
- Anti-reprisal policy - Employees and students shall not be discharged or discriminated against in any manner for bona fide reporting of health and safety hazards to CUNY Brooklyn College or to appropriate governmental agencies. Supervisors shall inform employees and students of this policy and encourage reporting of workplace hazards to the management.
 - Employee reports of unsafe conditions can also be submitted through the [Work Request system on WebCentral](#) or through the [anonymous online form](#) for reporting a concern.

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VI. SAFETY AND HEALTH TRAINING FOR EMPLOYEES

Training Content

Brooklyn College policy requires that “Faculty, staff and students shall have or be provided the knowledge to protect themselves from hazards in their working and learning environment.”

All managers, supervisors, and employees must be trained to (1) recognize potential hazards; (2) Maintain safety protection in the workplace; and (3) reinforce safe work practices and use required protective measures.

Training Program

Tier 1: General Safety Training

- General orientation provided by Human Resources to all new employees.
- Includes information on CUNY and Brooklyn College policies and practices, employee health and safety rights and responsibilities, health and safety services at Brooklyn College, and what the employee should expect in terms of further training.

Tier 2: Hazard-Specific Training

- Provided by the school, Department or area safety representatives in conjunction with EHS to employees and students in labs, shops, or other workplaces where special hazards may be encountered.
- Examples of training topics include hazard communication, departmental emergency response/evacuation procedures, forklift safety.
- EHS reviews Tier 2 Trainings for adequacy and consistency.

Tier 3: Job-Specific Training

- Provided by the supervisor for job categories with job-specific risk of exposure to safety and health hazards e.g., laboratory researchers, film production students, ITS workers, or other employees and students as appropriate.
- Training consists of information specific to the hazards and equipment used by these individuals. Training is communicated by one or more of the following methods: safety meetings (formal or informal), material safety data sheets, videos, pamphlets, booklets, and postings.

Training Schedule

Training shall be provided to all employees/ students:

- When new employees are hired;

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- When employees are given new job assignments for which training has not previously been received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the employer is made aware of a new or previously unrecognized hazard;
- When employees become supervisors (so that they can familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed).

Training Resources

- EHS assists schools and departments in providing health and safety training to employees on a variety of topics. These include general safety training, laboratory safety training, respirator training, radiological safety, and many others.
- EHS has developed presentations, available via Blackboard
- EHS has a collection of safety publications, and technical staff to assist supervisors and departments in implementing training programs.

Recordkeeping

- Documentation of training should include: (1) employee name or other identifier, (2) training date, (3) topic covered, and (4) trainer name.
- Training records of employees must be retained according to relevant recordkeeping requirements or CUNY/Brooklyn College policy.

VII. INCIDENT INVESTIGATION, ANALYSIS, AND REPORTING

CUNY Brooklyn College shall investigate workplace incidents (injuries, exposures, or illnesses). The following standardized procedures for reporting and investigating workplace injuries, illnesses, and incidents are reviewed below.

Employees are responsible for reporting any accidental injuries or work-related illnesses to their supervisors immediately.

Responsibilities of Employees

If there is a medical emergency in the work area:

- Notify the Office of Campus and Community Safety Services at extension 5444 or 5445 and stay on the phone until instructed to hang up. Conditions when 911 must be called area: * unconsciousness, however brief * chest pains * poisoning * incapacitating head, abdominal and other pain * impaired breathing * profuse bleeding * disorientation or impaired ambulation.

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- Be prepared to give as much information as possible, such as nature of injury, cause of injury and any hazards that may be present.
- If properly trained, render first aid.
- Obtain medical treatment; inform physician that injury or illness is work related.
- Do not attempt to pick up or move an injured individual.
- Clear the area of any objects that might impede rescue or interfere with emergency personnel.
- Notify the victim’s immediate supervisor as quickly as possible of any on-the-job injury or illness.
- If able, complete and submit to supervisor: an Employee Notice of Work-Related Injury or Illness form. If the employee is unable to complete the form or describe what occurred to a supervisor or co-worker, the individual assisting the injured employee should describe the facts known to the supervisor. The supervisor will complete.

Responsibilities of Supervisor

- Ensure employee has received medical treatment, as requested. Contact the Office of Human Resource Services (HRS) at extension 5131 if emergency contact information such as the name of a physician or an emergency contact telephone number is required.
- Ensure Campus Safety and Community Services Director or the Deputy Director is notified when the injury or illness occurs.
- If employee was unable to complete the Employee Notice of Work-Related Injury or Illness form, ensure that it is completed and signed. Forward the completed form to the Office of Human Resources Services and include
- Within 24 hours of occurrence, supervisors must investigate any workplace incident (injury, exposure, or illness) to identify root causes and follow-up with corrective measures.

Responsibilities of EHS

- All serious accidents and overexposures to chemical, biological, radiation, and physical stressors are investigated immediately by EHS.
- For other incidents where additional follow-up is appropriate, EHS reviews submitted Incident Investigation Reporting Forms to help ensure adequate corrective actions have been identified and implemented.

VIII. REVIEW OF INJURIES AND ILLNESSES

A review of incident reports is conducted annually by the Office of Environmental Health and Safety Director and staff. Incidents which result in reportable injuries and illnesses are compiled in the annual log to the U.S. Bureau of Labor Statistics and reviewed for categories of incidents. The report is shared with the Campus Health and Safety Committee (ex officio chair SVP of Finance and Administration) for identification of trends and possible mitigating steps or corrective actions.

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IX. EVALUATION, INVESTIGATION, and CORRECTION OF WORKPLACE HAZARDS

A major component of an effective program is system of ongoing evaluations, investigations, and meetings which assist the College in identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Supervisors are responsible for seeing that periodic inspections are conducted.

Work Area Inspection

Work area inspections shall be conducted according to the following schedule:

- Upon initial establishment of IIPP.
- Recommended frequency:
 - office areas - at least annually
 - labs and shops - at least quarterly
- When new substances, processes, procedures or equipment which present potential new hazards are introduced.
- When new, previously unrecognized hazards are identified.
- When occupational injuries or illnesses occur.

EH&S Internal Audit

To assist supervisors in identifying and correcting potential hazards, EH&S conducts surveys (e.g., baseline occupational health and safety surveys of operating units, inspections of hazardous materials storage/disposal, fire safety). Brooklyn College’s EHS Department conducts a review of compliance with health and safety issues related to the implementation of this IIPP.

Outside Agencies

Several outside agencies conduct regular, periodic inspections at Brooklyn College, which assist the University in achieving some of its inspectional responsibilities. These include: FDNY, DOH, DOLR

Recordkeeping of Scheduled and Periodic Inspections

Records of scheduled and periodic inspections to identify unsafe conditions and work practices shall be maintained by the supervisor for a minimum of one year (unless otherwise specified). The records shall include: The person(s) conducting the inspection, any description of the unsafe conditions and work practices, the actions taken to correct the identified unsafe conditions and work practices.

Hazard Identification and Assessment

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Brooklyn College is committed to correct unsafe or unhealthy work conditions in a timely manner, based on the severity of the hazards. EHS shall conduct regular inspections and audits of the workplace to identify and assess hazards that may cause injury or illness. Hazards will be prioritized based on the severity of the potential harm and the likelihood of occurrence.

Schedule for Correcting Hazards

Hazards shall be corrected according the following procedures:

- When observed or discovered;
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel will be removed from the area, except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with necessary safeguards.

Recordkeeping

As corrective actions are implemented, supervisors shall document the effort and maintain such record in accordance with [CUNY’s Record Retention Policy](#).

Resources

Unsafe conditions that cannot be corrected with resources available to the supervisor or manager must be reported to the next higher level of management. Resources to correct hazards include the following:

- Facilities Planning and Operations - If the correction required is part of facilities operations/ maintenance responsibilities, repairs are not charged to the department.
- Departmental Funds - If the repair does not fall into the category of maintenance, departmental funds may be required.
- School/College Funds- If departmental funds are not available, departments must seek other resources from the school or College or University.

X. EVALUATION, INVESTIGATION, and CORRECTION OF WORKPLACE HAZARDS

Program Evaluation

Brooklyn College will evaluate the effectiveness of the IIPP periodically to ensure its continued effectiveness in preventing employee injuries and illnesses. The evaluation will be conducted by management and will include a review of workplace inspections, hazard assessments, accident and incident investigations, and employee training records.

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Program Improvement

Brooklyn College will use the results of program evaluation to identify opportunities for improvement and to make changes to the IIPP as needed. Brooklyn College will also seek input from employees on ways to improve the program.

By implementing this IIPP, Brooklyn College will take a proactive approach to preventing employee injuries and illnesses and will demonstrate its commitment to providing a safe and healthy workplace.