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CHANCELLORS

University Policy on Management of Health, Safety and the Environment

Enclosed is a new [Policy on Management of Health, Safety and the Environment](#). Also enclosed are [guiding principles for implementation of the policy](#). This Policy and the guiding principles were developed by the Environmental Health and Safety (EH&S) Directors in consultation with campuses, the Academic Senate, the Office of Research Policy, Administrative Vice Chancellors, the Office of General Counsel, and numerous other UC functional offices. This Policy is effective immediately.

The goal of the new Policy is to provide campuses a tool with which to implement an integrated health, safety and environmental management system. The Policy establishes high standards for systemwide EH&S activities, meeting both Cal-EPA and Cal/OSHA requirements for safety and environmental management programs. The guiding principles are published under authority delegated to the Senior Vice President--Business and Finance for health, safety and environmental issues.

Questions about the new Policy and implementing guidelines may be directed to Joe Adams, Director, Environmental Health and Safety (Office of Risk Services) at (510) 987-0170, or joe.adams@ucop.edu.

Sincerely,

Robert C. Dynes

Enclosures

cc: Members, President's Cabinet
Laboratory Directors
Academic Council Chair Brunk
Principal Officers of The Regents

University of California Policy on Management of Health, Safety and the Environment

The University of California is committed to achieving excellence in providing a healthy and safe working environment, and to supporting environmentally sound practices in the conduct of University activities. It is University policy to comply with all applicable health, safety, and environmental protection laws, regulations and requirements.

To meet this standard of excellence, the University implements management initiatives and best practices to systematically integrate health, safety, and environmental considerations and sustainable use of natural resources into all activities. All University activities are to be conducted in a manner that ensures the protection of students, faculty, staff, visitors, the public, property, and the environment.

The University's goal is to prevent all workplace injuries and illnesses, environmental incidents, and property losses or damage. Achieving this goal is the responsibility of every member of the University community. Supervisors have particular responsibility for the activities of those people who report to them.

Guiding Principles to Implement the University of California Policy on Health, Safety and the Environment

The goal of implementation of the University of California Policy on Health, Safety and the Environment is to systematically integrate health, safety, environmental considerations, and sustainable use of natural resources into all activities. The following principles present the management system for accomplishing this goal.

The Integrated Safety and Environmental Management (ISEM) System provides a formal, organized process for planning, performing, assessing and improving University activities. The ISEM system is the University's tool for implementing health, safety and environmental management systems to meet the requirements of the California Environmental Protection Agency (Cal-EPA) Environmental Management System and the California Occupational Safety and Health Administration (Cal/OSHA) Illness and Injury Prevention Program.

The System is based on directives and contracts between users and supervisors, which comprise a framework for universitywide safety and environmental management principles and functions. The System encompasses all aspects of University life throughout the ten campuses, including the medical centers, the agriculture and natural resources system and the national laboratories managed by the University of California. Therefore, locations should seek the involvement of faculty, staff, and students during the development and implementation of the ISEM System at each location.

Throughout the following guidelines, the term *safety and the environment* is used as a synonym for health, safety and environment programs, which encompass a wide range of measures to protect faculty, staff, students, visitors, the public and the environment. University activities as described in these guidelines include teaching, research, public service, administration, student services, and construction and maintenance.

The ISEM system establishes the following hierarchy of components:

- Component 1: Health, safety and environment policy
- Component 2: Guiding principles
- Component 3: Core functions
- Component 4: Implementation

The policy, guiding principles, and core functions of ISEM are to be used consistently throughout the University. Implementation will vary by and within each location based on the nature and potential risk of the activities being performed.

Component 1: Policy on Health, Safety and the Environment

The Policy on Health, Safety and the Environment applies to all members of the University community. The policy also applies to contractors whose work is directed on a day-to-day basis by University employees. (Contractors who work independently under a defined scope of work are bound by the health, safety and environment requirements specified in the contract.) To maximize the goal of protecting the University, the community and the environment, the policy must be systematically integrated into all aspects of University operations. This will be accomplished by making the overall management of safety and environmental functions and activities an integral part of everyday activities.

Component 2: Guiding Principles

The following guiding principles are intended to provide direction from the inception of planning an activity to the actual performance.

1. Management Commitments and Involvement of Faculty, Staff, and Students

ISEM is based on individual responsibility for safety and environmental stewardship. Managers must be demonstrably committed to the implementation and sustained execution of all elements of the System. Faculty, staff, students, and visitors support the System by understanding and using ISEM elements in their activities at the University. Each individual is directly responsible for ensuring his or her own safety and for promoting a safe, healthy and environmentally sound workplace and community.

2. Management Responsibility for Safety and the Environment

University employees who direct the activities of other individuals are responsible for protecting faculty, staff, students, visitors, the public and the environment, and for adhering to this policy. Accountability should be addressed in job descriptions and performance evaluations, and in contracts.

3. Establishing Clear Roles and Responsibilities

The University will establish clear and unambiguous lines of authority and responsibility for ensuring safety and environmental protection at all organizational levels within the University, and with University contractors.

4. Ensuring Competence Commensurate with Responsibilities

Managers will ensure that employees possess the experience, knowledge, skills, and abilities necessary to discharge their health, safety and environment responsibilities.

5. Balanced Priorities

Resources will be effectively allocated to address safety and environmental protection in all activities. Protecting faculty, staff, students, visitors, the public and the environment is a priority whenever activities are planned and performed.

6. Identification of Safety and Environmental Standards and Requirements

Before a member of the University community conducts an activity which has potential adverse implications for health, safety or the environment, a responsible party must evaluate the associated hazards and environmental impacts and identify the appropriate set of protective safety and environmental requirements to assure that faculty, staff, students, visitors, members of the public, and the environment are protected from adverse affects. The principal responsibility for such an evaluation resides with employees and supervisors. The campus EH&S offices will provide assistance and consultation to identify requirements, controls, and their implementation.

7. Encouraging Stakeholder Participation

The University will implement a program of external communications and public participation and involvement to obtain input from interested parties including regulatory agencies, funding organizations, local community groups, students, alumni, and emergency response agencies. The program will institute a communications network to address compliance and emergency response situations.

8. Adapting Hazard and Operational Controls to Specific University Activities

The University will adapt administrative and engineering controls for activities being performed to prevent and mitigate hazards and environmental impacts. The strategy employed will be to preempt damage by designing the activities and controls to reduce or eliminate accidents, injuries, exposure, and unplanned releases of substances into the environment.

9. Obtaining Authorization Prior to Conducting an Activity

Before operations or activities are initiated, the person responsible for the activity must ensure that all protective safety and environmental requirements have been identified and addressed. Review and approval requirements may vary commensurate with regulatory requirements and the level of hazard or environmental impact associated with a particular activity. Certain higher risk operations require formal prior authorization. This authorization may be provided by appropriate protocol review committees, department heads, or other administrative offices. On occasion, agency permits must be secured before performing the activity. Each location will establish local procedures on obtaining appropriate authorization.

Component 3: Core Functions

Five core safety and environmental management functions provide the necessary framework for any activity that could potentially affect faculty, staff, students, visitors, the public, or the environment. The functions are applied as a continuous cycle with the degree of rigor appropriate to address the type of activity and the hazard or environmental aspect involved.

1. Defining the Scope of Activities

Goals and programs are translated into activities, expectations are set, tasks are identified and prioritized, and resources are allocated.

2. Analyzing the Hazards

Hazards and environmental aspects associated with the activities are identified, analyzed, and categorized.

3. Developing and Implementing Hazard and Operational Controls

Applicable standards and requirements are identified and agreed upon, controls to prevent/mitigate hazards and aspects are identified, the safety and environmental parameters are established and controls are implemented.

4. Performing Activities within Established Controls

Readiness is confirmed and activities are performed safely and in compliance with applicable regulations and policies.

5. Providing Feedback and Assuring Continuous Improvement

The appropriate parties obtain feedback on the adequacy of controls, identify opportunities for improving the definition and planning of activities, conduct departmental and independent oversight and, if necessary, participate in regulatory enforcement actions. As a complement to departmental management, the campus EH&S offices may be contacted to provide safety and environmental assistance, consultation, and independent oversight functions.

Component 4: Implementation

The University Policy on Health, Safety and the Environment must be clearly communicated to all members of the University community and University contractors. University expectations and commitments are expressed through this and other policies, procedures, guidelines and notices, and in contract specifications. The format for communicating specific expectations may vary from activity to activity, based on the hazards and the operations being performed.

The ISEM system relies on establishing objectives and on tracking performance with respect to achieving and maintaining compliance with health, safety and environmental requirements. The

system's metrics assess continuous improvement in regulated and non-regulated illness, injury, and pollution prevention efforts at the operational or source level. On an annual basis, the EH&S Leadership Group will report progress in achieving health, safety and environment goals to the President and The Regents.

The EH&S Leadership Group will establish an advisory council to guide and assess implementation of this system.

References:

California Code of Regulations Title 8, Section 3203 [Injury and Illness Prevention](#) Program
U.S. Environmental Protection Agency [Integrated Environmental Management System](#)