

**Liberty University**  
**Environmental Health & Safety Training &**  
**Accountability Policy & Procedures**



## **PURPOSE & SCOPE**

In an effort to effectively maintain a safety work environment for the entire LU community as well as ensure continuity and compliance with federal, states and local regulations, the Liberty University Environmental Health and Safety department (EHS) has developed policies and procedures for the training and accountability of employees and leadership as it pertains to Environmental Health & Safety Issues.

## **POLICY**

This policy and associated procedures provide a means to address issues of non-compliance as it relates to environmental health & safety issues. Liberty University expectations in the area of environmental health & safety compliance is to ensure safe and effective operations while satisfying federal, state, and local regulations, such as regulations from the Occupational Safety and Health Administration, Environmental Protection Agency, Virginia Department of Environmental Quality, and other federal state, and local agencies. Ensuring the safety of our LU community and compliance with regulations is central to university operations. EHS maintains oversight responsibility for key areas of environmental health & safety, however, each person has their specific responsibilities to keeping themselves and others around them safe. To this extent, this policy addresses how issues of non-compliance in regard to environmental health and safety issues is addressed within the organization.

## **APPLICATION, IMPLEMENTATION AND RESPONSIBILITIES**

As the EHS department has developed, it has led to many policies, procedures, and training being prepared to protect our employees and overall, LU community. Policies and Procedures can be found on the LU EHS website at <https://www.liberty.edu/security-public-safety/environmental-health-safety/>. Additionally, on this website personnel have access to many of the training classes online through canvas. However, some classes are required to be done in the classroom and in the field due to the complexity of the information and the risks associated with the type of work or exposure.

It is the responsibility of the supervisor to ensure that each employee has the proper safety training in the areas in which they work, prior to allowing them to perform such duties. If an employee is found not having the proper safety training to perform the work assigned, EHS will issue a notice of noncompliance, stop the work, and send the employee to their supervisor. The EHS representative will contact the employee's supervisor and explain what the issue is and send the supervisor the notice of noncompliance.

There is no way to develop training that will encompass every aspect of safety through the EHS department. This is why the Occupational Safety & Health Administration (OSHA) addresses areas outside the fundamental safety issues with the General Duty Clause 5A1 which states "Each employer shall furnish to each of his employees, employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees".

This is why it is critical that supervisors utilize the Job Hazard Analysis (JHA) tool to identify potential tasks associated with the job duties for a project each and every day, to help address those potential exposures and educate personnel on how to protect themselves. To this end, where there are no specific EHS policies and/or government regulations, supervisors and employees must apply best practices.

Each and every employee is responsible for their own safety, however, each supervisor of an employee is responsible for ensuring that the employee has the proper training, is applying that training and that a job hazard

analysis is completed for each project each day and reviewed with the employee(s) working on the project to help ensure their safety.

In an effort to hold everyone accountable in regard to working safely, the LU environmental health and safety office will complete a notice of noncompliance when a safety issue is identified in which policies and/or regulations were not followed, every effort was not made to protect the employee and surrounding LU community or when personnel are working without the proper training. This is not meant to be an all-inclusive description of when a notice of noncompliance will be issued but to address the primary areas in which this would apply. See Attachment A.

The management level to which this notice of noncompliance is addressed depends on two factors, the frequency and the severity of the issue(s) identified. For a first offense the issue is addressed specifically with the supervisor (usually and manager or director). A second offense is addressed with the leadership of the division or department. This will usually be at a Vice President or above level. A third offense is elevated to the Human Resources Department. However, depending on the severity of the situation, the EHS and Office of Security & Public Safety Leadership may escalate the issue directly to a VP or HR level immediately.

The purpose of the notice of noncompliance is to address the issues within the organization to help identify how the situation can be addressed and prevented in the future. EHS may require additional training for the individual(s). However, any other corrective/preventive actions such as more hands on training, disciplinary action, etc. is the responsibility of the leadership of that department. If and or when the issue has to be elevated to Human Resources, corrective/preventative actions will be entirely at their discretion.

## **ENFORCEMENT**

Failure to follow the Liberty University Policy & Procedures can result in life threatening or serious injury situations to staff, faculty, students, and visitors. Failure to follow the University Policy and Procedures as it pertains to Environmental Health & Safety can result in disciplinary action up to and including discharge.

**ATTACHMENT A**

NOTICE OF NONCOMPLIANCE

SEE NEXT PAGE

## **NOTICE OF NONCOMPLIANCE**

Employee Name:		Date:	
LU Identification Number:			
Division or Contractor:		Department:	
Notice to (Mgr., Dir, VP, etc.)			

<b>Offense</b>			
<input type="checkbox"/> First Offense	<input type="checkbox"/> Second Offense	<input type="checkbox"/> Third Offense	
<b>Severity</b>			
<input type="checkbox"/> Low Risk	<input type="checkbox"/> Moderate Risk	<input type="checkbox"/> Serious/Extreme	<input type="checkbox"/> Critical/Catastrophic

<b>Type of Noncompliance:</b>			
<input type="checkbox"/>	Job Hazard Analysis	<input type="checkbox"/>	Training
<input type="checkbox"/>	Confined Space Entry	<input type="checkbox"/>	Trenching & Excavation
<input type="checkbox"/>	Bloodborne Pathogen	<input type="checkbox"/>	Ladder Safety
<input type="checkbox"/>	Hazard Communication	<input type="checkbox"/>	Hot Works
<input type="checkbox"/>	Silica	<input type="checkbox"/>	Asbestos
<input type="checkbox"/>	Electrical Safety	<input type="checkbox"/>	Hazardous Energy Control
<input type="checkbox"/>	Chemical Safety	<input type="checkbox"/>	Work Zone & Flagging
<input type="checkbox"/>	Heat Illness Prevention	<input type="checkbox"/>	Lab Safety
<input type="checkbox"/>	Electrical Safety	<input type="checkbox"/>	Fireworks/Pyrotechnics
<input type="checkbox"/>		<input type="checkbox"/>	Fall Protection
<input type="checkbox"/>		<input type="checkbox"/>	Mobile Elevated Work Platform
<input type="checkbox"/>		<input type="checkbox"/>	Golf Cart, LSV or UTV
<input type="checkbox"/>		<input type="checkbox"/>	Heat Illness Prevention
<input type="checkbox"/>		<input type="checkbox"/>	Lead Based Paint
<input type="checkbox"/>		<input type="checkbox"/>	Personal Protective Equipment (PPE)
<input type="checkbox"/>		<input type="checkbox"/>	Respiratory
<input type="checkbox"/>		<input type="checkbox"/>	Forklift
<input type="checkbox"/>		<input type="checkbox"/>	Open Burn/Open Flame

<b>Description of Noncompliance:</b>

<b>Corrective/Preventive Action(s) Taken:</b>

<b>Meeting</b>			
Was meeting held to review Notice of Noncompliance?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, List Participants
<b>NAME</b>	<b>TITLE</b>	<b>DEPARTMENT/DIVISION</b>	

**Copies to: Division Head, VP of Security & Public Safety, Human Resources**  
**Attach any supporting photos, documentation, etc.**

# Liberty University Environmental Health & Safety Training & Accountability Policy & Procedures

## Revision Tracking

Revision Number	Revision Description	Revision Location	Date Originated/Revised	Policy Author/Reviser:	Policy Approvers
	Original		January	Greg Bennett – A Bob Drane - R	Ronald Sloan John Peterson Greg Bennett