HAZARD REPORTING, EVALUATION, AND MANAGEMENT

INTRODUCTION

PURPOSE
Duke values its staff and strives to provide safe work and a safe work environment. The health and safety of every staff member, patient, student, visitor, and the environment are primary considerations in Duke's continuous efforts to eliminate or reduce conditions and behaviors that could result in injuries or illnesses. Duke is committed to the principle that such a safety culture will help maintain employee health, increase productivity, minimize lost work time, and reduce costs.

Identification and reporting of potentially unsafe working conditions is the responsibility of all employees at Duke University. Since many such conditions can be quickly eliminated once they are identified, an effective channel of oral and written communication is necessary to the development of a sound safety program.

RESPONSIBILITIES

Department heads are expected to:

- Inform all employees of their responsibilities for reporting hazards and encourage the submission of oral reports as the quickest and most effective means of hazard identification and resolution.

- Task managers and supervisors to lead and/or participate in proactive programs and audits of their work areas to ensure that safety issues or concerns are identified and resolved.

- Take appropriate steps to eliminate or reduce safety or health hazards in a timely manner.

Supervisors are expected to:
• Conduct periodic audits of work areas to identify hazardous conditions.

• Ensure that any unsafe conditions or equipment and work hazards are brought to the attention of management.

• Report accomplishment of corrective actions to their Department Heads.

Employees are expected to:

• Bring all unsafe conditions, behaviors, or practices that create risks for themselves, patients, students, visitors, or the environment to the attention of their supervisors.

• Report all work-related injuries or illnesses within 24 hours.

The responsible Safety Office is expected to:

• Identify and prioritize hazards through periodic workplace audit programs.

• Coordinate the evaluation of hazards reported by individual departments.

• Track the hazard correction process until completed.

• Provide guidance to departments about corrective action options.

• Identify employees at risk through the exposure determination process.

PROCEDURES

REPORTS OF HAZARDOUS CONDITIONS

All employees are expected to report unsafe or unhealthy conditions to their immediate supervisor. The supervisor shall promptly investigate and take appropriate corrective actions, contacting the Institutional Safety Office for assistance as necessary. The supervisor shall keep the reporting employee informed of all action taken.

Members of the Duke community may submit a report of unsafe or unhealthy conditions directly to the Institutional Safety Office. Upon receipt, the responsible Safety Office will contact the originator to acknowledge receipt and discuss the seriousness of the reported hazard and shall advise the responsible manager that a hazard has been reported.
All employees have a right to contact the North Carolina Department of Labor, Division of Occupational Safety and Health directly; however, we encourage the use of the internal Duke hazard reporting procedure as the most expeditious means to achieve a resolution. A North Carolina Department of Labor poster, installed in prominent locations, can be consulted for additional information.

**HAZARD ASSESSMENT**

Hazards may be identified in a number of ways: through periodic safety audits, through supervisor/employee reports, or through incident investigations. Hazards may include those facilities, equipment, or work operations which present risk of injury/illness or do not comply with existing regulations or standards. Regardless of how identified, each hazard will be validated by the appropriate safety group. Once validated, an assessment of the issue will be done in order to establish its priority of risk. Priority of risk will be based on the probability for the condition to cause an injury or illness as well as the anticipated severity of the most likely outcome.

Conditions that are considered to present an imminent danger of loss of life or property will trigger immediate actions to mitigate the hazard.

**REPORTS**

Written reports of hazard assessment will be provided to the department by the responsible Safety Office. The report will include a description of the condition, an evaluation of its relative priority, and recommendations for reducing or eliminating the hazard. For higher priority hazardous conditions, the responsible Safety Office may request a written response outlining the department’s steps to manage the hazard.

**CORRECTIVE ACTIONS**

With the assistance of the responsible Safety Office and other Duke resources, the Department shall decide on the preferred option for corrective action and then initiate the planned actions as quickly as possible, but not later than the dates specified by the responsible Safety Office. In most cases, the hazard priority of a problem can be significantly reduced with a few simple actions, which, although they may be temporary, allow time for a permanent solution to be implemented. In cases where a department response is required, the responsible Safety Office will track the corrective action process.

Departments are expected to follow hazard reduction recommendations according to the established plan. When appropriate actions are not completed within the specified time, the responsible Safety Office will request that the responsible manager provide within one week a written explanation of:
• Reasons for delay
• Measures taken to date to eliminate or mitigate the condition
• Further steps to be taken for resolution
• Timetable for completion.

If the responsible manager does not provide a satisfactory response within one week of notification, the responsible Safety Office will send a written report of unsatisfactory progress to the manager’s Department Head, Faculty Dean, or other representative of the Institutional Administration, as appropriate.

If satisfactory resolution still cannot be obtained, the matter will be escalated to the appropriate Institutional Safety Committee and, if necessary, senior Institutional Administration.

REFERENCES


Public Law 91-589, The Occupational Safety and Health Act of 1970
Code of Federal Regulations, Title 29 (OSHA), Occupational Safety and Health Standards

National Fire Protection Association (NFPA) 30, Flammable and Combustible Liquids Code
National Fire Protection Association (NFPA) 45, Fire Protection for Labs Using Chemicals
National Fire Protection Association (NFPA) 99, Health Care Facilities Code

North Carolina Building Code

Facility Guidelines Institute (FGI), Guidelines for Design and Construction of Hospitals and Outpatient Facilities