

Issued: 06/16/2022

POLICIES

Responsible Executive Vice President and Chief Operating and
Official: Financial Officer

Responsible Environmental Health and Safety
Office:

Purpose

The University of Memphis (the “University”) is committed to maintaining a safe and compliant campus. As such, the University expects all employees, students and other members of the campus community to comply with all applicable environmental, health and safety laws and regulations. Environmental Health and Safety (EHS) develops and maintains programs and procedures that allow the University to promote excellence in environmental, health and safety administration.

The University wishes to maintain a safe and healthy environment for all members of the campus community including students, faculty, staff and visitors. Furthermore, the University seeks continuous improvement to safety culture and environmental stewardship initiatives. Additionally, the University, through the vehicle of EHS, develops and implements standards that comply with federal, state and local regulations pertaining to environmental, health and safety that reduce institutional liability and that exhibit financial responsibility.

Policy

Roles and Responsibilities-

All students, faculty and staff share a role in abiding by this policy. The roles and responsibilities outlined apply generally to this policy. Roles and responsibilities within each safety program are defined within the appropriate safety program document.

All University of Memphis Students, Faculty and Staff must:

- Abide by this policy and all applicable University environmental health and safety programs and procedures.
- Comply with all federal, state and local regulations and codes.
- Notify EHS, an immediate supervisor or a faculty member if a safety or compliance issue or concern is observed.
- Attend applicable EHS training.
- Notify EHS of any regulatory agency visit related to environmental health and safety so that EHS may accompany the regulator (Note: Internal Audit also needs to be contacted in such circumstances. Staff in the affected department or EHS may contact Internal Audit in compliance with [GE2016-Notification of External Audits and Reviews](#)).
- Support voluntary EHS initiatives.
- Report (or ensure reporting of) all work-related injuries, illnesses and/or exposures to Human Resources and EHS
- Report (or ensure reporting of) all environmental spills and/or releases to EHS.

Director of Environmental Health and Safety

- Manage operations and services of EHS.
- Where there is an immediate danger to life, health or the environment, order the suspension of hazardous activities until the appropriate measures have been taken to remove the imminent danger.
- Serve as a voting or a non-voting member on University-led safety committees or designate EHS personnel to do so.
- Set priorities for University resources in support of EHS programs in line with the University's mission and this policy.

Department of Environmental Health and Safety

- Develop, implement and revise written programs to comply with applicable environmental health and safety laws, regulations and codes.
- Obtain stakeholder input before implementation or revision of programs that will affect said stakeholders.
- Provide service and support to facilitate safety and compliance.
- Provide resources for training and auditing.
- Provide environmental, health and safety oversight for all University operations.

- Manage relationships with the regulatory community in environmental, health and safety issues.
- Provide support for emergency planning and services in environmental health and safety issues.
- Conduct hazard analyses including exposure monitoring to identify control measures required to provide a safe work and study environment.
- Conduct periodic reviews of University operations and facilities to identify areas of high-risk and/or non-compliance.
- Present corrective actions or other risk mitigation strategies to appropriate personnel to implement.
- Accompany any regulatory agency visit related to environmental health and safety (Note: Internal Audit also needs to be contacted in such circumstances. Staff in the affected department or EHS may contact Internal Audit in compliance with [GE2016- Notification of External Audits and Reviews](#)).

Management (including academic, research, clinical and administrative positions)

- Implement this policy as well as other applicable EHS programs and procedures.
- Provide feedback for applicable EHS programs and procedures.
- Require students, faculty and staff to complete required applicable safety training and to report accidents and other incidents as appropriate.
- Encourage the development of an internal safety committee to address EHS concerns and coordinate environmental, health and safety initiatives within the department. The committee should work with EHS and to accomplish this goal.
- Aid in the development of an evacuation plan for facilities under the manager's control that includes evacuating individuals with disabilities or delegate said responsibility to a competent individual.

Building Manager

- Monitor designated facility(s) for environmental, health and safety violations.

- Notify EHS immediately of regulatory inspections within the designated facility(s) and escort inspection agency personnel in concert with EHS (Note: Internal Audit also needs to be contacted in such circumstances. Staff in the affected department or EHS may contact Internal Audit in compliance with GE2016).
- Coordinate correction of facility-based violations of environmental, health and safety regulations within required timeframes.
- Ensure maintenance of building safety equipment including (but not limited to): chemical fume hoods, safety showers, eyewashes and fire extinguishers.
- Support coordination between EHS and project managers to ensure safety and compliance issues are addressed in new construction and renovation of assigned spaces.
- Notify EHS when violations cannot be corrected within required timeframes.
- Aid in routine EHS inspections and assessments of work areas.
- Support the implementation of EHS programs and procedures for the department to meet their environmental health and safety goals and obligations.

Human Resources

- Administer a process that informs individuals of their role related to environmental, health and safety.
- Refer outstanding safety and compliance issues discovered through the filing of workers' compensation claims to EHS for review and resolution.

Physical Plant

- Coordinate with the building manager for correction of facility-based environmental, health and safety issues.
- Monitor contractor activities in cooperation with EHS for environmental, health and safety issues and determine course of action if issues are not resolved.

Research Compliance

- Monitor research conducted at the University to inform EHS when research activities are being proposed that require EHS involvement.

Determination of Applicable Requirements

- EHS shall identify, interpret and communicate to affected parties within the University both existing and proposed regulations.
- Affected parties shall consult with EHS for interpretation of regulations that apply to them.

Safety Program and Procedure Development

- EHS shall develop and revise safety programs that communicate specific compliance requirements of affected parties by interpretation of applicable laws, regulations, standards and codes with feedback from affected parties.
- Affected parties shall comply with all applicable safety programs and provide feedback in program development and revision, as appropriate.

Assessment of Compliance with Regulations

- EHS shall assess compliance with applicable regulations that pertain to environmental, health and safety through onsite inspections and reviews, assessments and audits and other means necessary to determine level of compliance. EHS shall provide tools to allow affected parties to perform self-audits, as appropriate. Results, when appropriate, will be shared with Internal Audit per [GE2016- Notification of External Audits and Reviews](#).
- Affected parties shall coordinate with EHS to assess all operations for compliance and provide necessary resources for EHS to complete assessments.

Corrective Actions for Non-Compliance

- EHS shall assist affected parties in determining and taking the appropriate corrective actions for observed non-compliance issues. EHS shall monitor correction on non-compliance issues by onsite review, interviews and other means.
- Affected parties shall correct identified non-compliance issues and communicate the corrective action taken to EHS.

Hazard Assessment

- EHS shall assist in identifying and assessing workplace hazards and in the development and monitoring of protection strategies.
- Affected parties shall work with EHS to address workplace hazards in a manner that meets safety and regulatory requirements.

Regulatory Report Submission

- EHS shall collect and maintain data for the purposes of providing reports to appropriate regulatory agencies. EHS shall submit or aid in submission of regulatory reports, as appropriate.
- Affected parties shall assist EHS in data collection where necessary and submit or aid in the submission of regulatory reports, as appropriate.

Emergency Planning

- EHS shall be a resource in identifying potential emergency scenarios and suggest appropriate responses to such scenarios to the safety and emergency planning manager.
- Affected parties shall inform EHS of hazardous situations that may require emergency planning and provide practical input into applicable emergency plans.

Determination of Training Requirements

- EHS shall determine, based on duties and location, the environmental, health and safety training that is required. EHS shall either provide the training or review available training that is applicable to the situation for suitability.
- Affected parties shall take the required training and ensure those for whom they are responsible have also taken the required training.

Liaison with Regulatory Community

- EHS shall interact with regulatory entities on behalf of the University on environmental, health and safety issues and shall communicate said interaction to affected parties.
- Affected parties shall immediately notify EHS of a regulatory agency inquiry, visit or enforcement action on environmental, health and safety issues; EHS and/or the affected party shall contact Internal Audit per [GE2016- Notification of External Audits and Reviews](#). Affected parties shall collaborate with EHS regarding interaction with regulatory entities.

Reporting of Work or Research-Related Injury, Illness or Exposure

- EHS shall perform an incident investigation for work or research-related injury, illness or exposure as appropriate.
- Affected parties shall report all work or research-related injuries, illnesses or exposures to EHS in a timely manner. Affected parties shall cooperate with EHS and Human Resources to ensure that any employee that sustains a work-related injury, illness or exposure is provided timely and proper medical treatment.

Reporting of Incidents Not Involving Injury, Illness or Exposure

- EHS shall perform or assist in an incident investigation for major incidents including, but not limited to, hazardous material spill, fire and highly hazardous material loss or theft. EHS shall provide recommendations to address the incident to minimize the potential for recurrence.
- Affected parties shall report incidents to EHS in a timely manner and assist EHS in implementation of recommendations to address the incident to minimize the potential for recurrence.

FAQs

Who do I contact with further questions?

Environmental Health and Safety Office (901-678-5700 or ehas@memphis.edu)

For questions related to workers' compensation, contact Human Resources at hrrservicecenter@memphis.edu or 901-678-3573.

Subject Areas:

Academic	Finance	General	Human Resources	Information Technology	Research	Student Affairs
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