

ENVIRONMENTAL HEALTH & SAFETY

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Originating Office: Office of the
Vice-President, Services

Supersedes /Amends: VRS-40/February 1, 1991
VRS-44/February 1, 1990

Policy Number: VPS-40

PREAMBLE

This policy combines, and replaces, the existing versions of VRS-40 (*Environmental Health and Safety*) and VRS-44 (*Health and Safety Responsibilities at the Operational Level*). It has been updated to include the description of Concordia University's EH&S Management System. In addition, this policy expands on the two previous ones in several important ways:

- It outlines the levels of responsibility, descending from the President's Executive Group through the levels of supervision to the individual employee and student with accountability passing back up
- It expands the scope of the University's responsibility in accordance with the new federal legislation, C-21 (formerly known as C-45), which amends the criminal code, by specifically addressing the health and safety responsibilities of employees with authority to "direct work" who have not been traditionally considered to be supervisors and to include the protection of students and visitors
- It encompasses emergency management responsibilities to comply with Canadian standards, provincial legislative requirements and the University's group insurance risk management advisor's recommendations
- It describes the role of the Environmental Health and Safety Office as a staff function supporting the line management and clarifies its mandate
- It supports the internal responsibility system and complies with *la loi de la santé et de la sécurité du travail* by providing employee and student input in decisions which affect their health and safety
- It provides for reporting to the Board of Governors for the purpose of "due diligence"

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SCOPE

This policy applies to all members of the Concordia community and also includes visitors and contractors.

PURPOSE

Every employee and student is entitled to a safe environment in which to work and study. Concordia University will exert every effort to protect the health, safety and physical well-being of its students, employees and visiting public.

It is the policy of Concordia University to comply with all federal, provincial and municipal laws, regulations, labour codes and generally accepted standards of practice, which affect its employees, property and operations.

Concordia University also commits to formulate and carry out continuing effective environmental health and safety programmes suited to the conditions and hazards of University operations, where necessary adopting standards and practices in excess of legal and regulatory requirements.

The prime responsibility for health and safety lies with the line of supervision, where responsibility is delegated downwards and accountability passes upwards to the President's Executive Group.

Individual students and employees are expected to take a responsible attitude towards their own safety and to conduct themselves in a manner, which is respectful of their own health and safety and that of others.

POLICY

1. A comprehensive environmental health and safety (EH&S) management system shall be established which will apply to all university activities, facilities and operations. The purpose of this EH&S management system is to:
 - a. Develop and maintain EH&S programmes which support the academic research and service activities of the University;

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- b. Provide a framework whereby these activities can be carried out in a manner which protects the health and safety of all personnel, students and visitors and the environment;
 - c. Consider the unique health and safety concerns of the academic, research and service activities;
 - d. Designate responsibility and accountability through the line of supervision throughout the University;
 - e. Clarify the role and mandate of the Environmental Health and Safety Office;
 - f. Establish a network of health and safety committees at the central and unit level to allow employees and students to participate in decisions which affect their health and safety and which supports the internal responsibility system;
 - g. Stimulate the interest and encourage the participation of all employees and students in EH&S issues which affect them and their community;
 - h. Encourage the inclusion of education, training and information regarding health, safety and environmental responsibility in the academic programme wherever appropriate;
 - i. Take cognizance of the experience and accumulated knowledge of the resources within the University community and of other competent authorities.
2. Every member of the University Community is expected to:
- a. Take all reasonable steps to protect the health and safety of themselves, their colleagues and other members of the community;
 - b. Give first priority to establishing safe practices and working conditions and maintaining an environment which is safe and healthy;

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- c. Comply with all relevant regulations and standards of governments, agencies and other competent authorities respecting environmental health and safety;
- d. Promptly report all injuries, incidents and dangerous conditions to the appropriate authority;
- e. Participate with their colleagues and supervisors in the identification and elimination of hazards;
- f. Be familiar with and follow emergency procedures;
- g. Attend all required training and participate in other EH&S activities as requested.

Administration

President's Executive Group

- 3. The President's Executive Group shall have the ultimate responsibility for the EH&S programme and the maintenance of an effective EH&S management system.
- 4. It shall receive and respond to reports and recommendations from the Vice-President, Services and the Director, Environmental Health & Safety.
- 5. The President's Executive Group shall take the necessary measures to ensure that the University is duly diligent in regards to environmental health and safety matters.

Vice-President, Services

- 6. The Vice-President, Services, shall have overall administrative responsibility for the Environmental Health and Safety Programme at Concordia and shall have the following responsibilities:
 - a. To advise the Office of the President and the Board of Governors on environmental health and safety matters for purposes of due diligence;

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- b. To oversee the Director, who is directly responsible for developing supporting and evaluating the Environmental Health and Safety Management system and related programmes;
- c. To emphasize the priority of programme objectives during the budget planning process;
- d. To advise senior administrators in directing the environmental health and safety related activities under their control.

Director of Environmental Health and Safety

- 7. The Environmental Health and Safety Office is a service department reporting to the Vice-President, Services. Its mandate is to develop and oversee a comprehensive environmental health and safety programme encompassing all University activities and facilities, which, while complying with legislation and accepted standards of practice, upholds the academic mission and supports the teaching, research and service activities of the University. In addition to developing institutional policy and programme components, the Office supports individuals and groups in the exercise of their rights and responsibilities, provides professional advice and technical support to managers at all levels, provides official liaison with external regulatory bodies and performs an audit function for compliance. It informs Senior Management about serious problems and legislative changes having an impact on the University for the purpose of due diligence. It manages and coordinates those aspects of the environmental health and safety programme which have been centralized: fire prevention, injury/incident reporting, hazardous materials management, radiation safety, industrial hygiene, workers' compensation, first aid training and emergency response.
- 8. Under the authority of the Vice-President, Services, the Director of Environmental Health and Safety shall be responsible for the development, execution and evaluation of a comprehensive Environmental Health and Safety Programme for the University community. The Director shall also coordinate the efforts of health and safety committees, safety officers and others concerned with environmental health and safety throughout the institution.

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9. The Director of Environmental Health and Safety shall have the following responsibilities:
- a. To develop, oversee and evaluate the University's EH&S management system;
 - b. To develop and administer programmes encompassing all aspects of environmental health and safety for students, employees, faculty and visitors, to include such areas as industrial safety, sanitation, workplace design, radiation safety, fire prevention, public safety, biosafety, industrial hygiene, hazardous materials, management and waste disposal, emergency response, safety education, accident prevention and occupational health including workers compensation;
 - c. To ascertain the needs for new environmental health and safety programmes and submits recommendations regarding their implementation;
 - d. To keep abreast of the latest developments in environmental health and safety research and legislation;
 - e. Where appropriate, to recommend and encourage the application of new equipment, methods and education to the University's operations;
 - f. To maintain liaison with the Commission de la santé et de la sécurité du travail (CSST) and other federal, provincial and municipal government services and community resources concerned with safety and environmental health matters;
 - g. To provide periodic reports to the President's Executive Group and the Board of Governors for purposes of due diligence.

Senior Administrators, Deans and Executive Directors

10. Senior Administrators, Deans and Executive Directors shall be responsible for the implementation and oversight of the Environmental Health and Safety Programme within their areas of responsibility.

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11. Senior Administrators, Deans and Executive Directors shall have these specific responsibilities:
 - a. To ensure that supervisory employees, reporting to him or her, assume their responsibilities in the application of the programme at their respective levels;
 - b. To evaluate the EH&S performance of relevant department or unit and take corrective action where appropriate;
 - c. To ensure that workplace inspections are carried out on a regular basis and recommended corrections are addressed appropriately and in a timely manner;
 - d. To ensure that University emergency procedures are communicated, understood and followed;
 - e. To support new EH&S programme development as warranted;
 - f. To ensure that the environmental health and safety aspects of new programmes and activities have been adequately reviewed, that the space, service and compliance requirements have been accurately identified and can be provided for in the attended activity and the proposed use of hazardous materials or processes have been approved by the appropriate body;
 - g. To support and recognize individuals with EH&S responsibility working with the departments or units under his or her responsibility;
 - h. To establish and support a health and safety committee for the Faculty or for each unit under his or her jurisdiction, as required, or following recommendations from the Central Advisory Health and Safety Committee and/or the Director of Environmental Health and Safety;
 - i. To identify those hazards or programme deficiencies that require intervention from the EH&S office or which require central support and bring these forward to the appropriate body.

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Managers/Supervisors

12. In their day-to-day direct contact with employees, Managers and/or Supervisors shall be responsible for ensuring regular and constant identification and application of appropriate health and safety programme and standards, for ensuring safe working conditions, and the prompt reporting of injuries and incidents. Managers and supervisors shall be expected to work with their employees and the health and safety committee to identify and eliminate hazards and, when unable to manage these at the unit level, to report deficiencies up the line of supervision to a level where they can be addressed.

13. Managers and/or Supervisors shall have these specific responsibilities:
 - a. To oversee the health and safety of employees reporting to him or her by implementing the University health and safety programmes at the unit level and, if warranted due to the nature of the risks and activities carried out within the unit, implement additional programmes as appropriate;

 - b. To ensure that the employees, under his or her supervision are informed of government regulations, professional norms, generally accepted standards of practice and of University EH&S policies and procedures which apply to them and the work carried out in their area and ensure that they are observed;

 - c. To inform all employees of the risks and safety requirements of their tasks and provide each employee with the information training, supervision and assistance required to protect his or her health and safety and that of other members of the University Community;

 - d. To ensure that the appropriate safety equipment and protective devices are provided, maintained and used in accordance with accepted standards;

 - e. To inspect or have inspected on a regular basis, workplace, tools, and equipment and take the necessary measures to correct unsafe conditions and work practices;

 - f. To ensure that prompt medical assistance is provided to employees, students or visitors who may become ill or injured;

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- g. To recruit, support and recognize the certified first-aiders, fire monitors and emergency responders required for the unit and ensure that they have received the necessary training. Maintain up-to-date list of their names and contact information and post this in a visible location;
- h. To maintain a fully equipped first aid kit and emergency information and ensure that these are placed in a location which is accessible and visible to all employees and students;
- i. To immediately report to the Environmental Health and Safety Office all injuries and any incidents which could have resulted in injury or serious material damage;
- j. To support the “Return to Work Programme” by temporarily providing modified work or light duties when requested by the Environmental Health and Safety Office;
- k. To carry out investigations of injuries and incidents to determine their cause and prevent their recurrence;
- l. To inform the Environmental Health and Safety Office when an employee returns to work following an injury or work-related illness;
- m. To cooperate with the Health and Safety Committee in his or her area;
- n. To organize, support and participate in health and safety meetings, training and information sessions as appropriate and encourage the participation of employees under his or her supervision;
- o. To encourage employees to make recommendations for improving safety within the unit;
- p. To ensure that his or her immediate supervisor is advised of all safety-related matters which cannot be resolved at the unit level.

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Employees and Students

14. Individual students and employees shall be expected to take a responsible attitude towards their own safety and to conduct themselves in a manner, which is respectful of their own health and safety and that of others.
15. Employees and students shall have these specific responsibilities:
 - a. Not to perform any function or operation which they consider may be hazardous, or is known to be hazardous, before consulting with the supervisor or instructor as to the safety procedure(s);
 - b. Not to perform any task or function, which may put another in danger;
 - c. To be familiar with all University, departmental and unit safety instructions, whether written or oral, and to comply with such instructions when performing assigned duties;
 - d. To inform the immediate supervisor/instructor (or Human Resources or the, Environmental Health and Safety department) of any personal medical condition which combined with the working conditions or exposure to certain substances might jeopardize his or her health;
 - e. To assist injured persons in obtaining prompt medical treatment when necessary;
 - f. To inform the supervisor or instructor of all injuries, hazardous materials spills or near-miss incidents immediately, or at latest before leaving the premises, and file reports if requested to do so;
 - g. To bring to the attention of the immediate supervisor or instructor any health or safety hazard which they have identified and which they cannot correct;
 - h. To participate with the supervisor/instructor in the identification of hazards;
 - i. To follow all safety instructions and standard operating procedures and use the safety equipment provided;

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- j. To use only tools, equipment and materials approved or provided by the supervisor or instructor;
- k. To submit to the supervisor/instructor any recommendations for improving the safety and efficiency of the working environment;
- l. To participate in any appropriate health and safety meetings or training programmes provided for employees or students;
- m. To be familiar with emergency procedures and cooperate fully with emergency personnel;
- n. To cooperate with the departmental health and safety committee and personnel charged with health and safety responsibilities;

Academic Departments

16. Administrators, faculty and staff working in academic departments shall have the same responsibilities as those in non-academic units with the addition of their responsibility towards their students and for specialized teaching and research activities.

Department Chairs and Research and Unit Directors

17. Department chairs and research directors shall be responsible for the implementation, support and monitoring of the health and safety programmes within their departments or research areas. These programmes shall comply with all relevant federal, provincial and municipal legislation, [Official University Policies](#) and generally accepted standards of practice. Where necessary, due to the nature of the activities, additional standards and practices may be adopted to address the specific risks.
18. A chair or research director may appoint an academic safety officer to assist them in carrying out the responsibilities assigned to them in this Policy. In such cases, except in situations where the designated safety officer is a manager or supervisor to whom some or all of these functions have been assigned directly through the line of supervision, the role shall be largely one of providing support and advice to the Chair.

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19. Under no circumstances does the appointment of safety officers absolve chairs or research directors of the responsibilities incumbent upon them as managers. Problems, which cannot be resolved at their level, must be referred up the line to the next level or to the appropriate service unit for attention.

20. Department Chairs and Research and Unit Directors shall have these specific responsibilities:
 - a. To oversee the application of environmental health and safety programmes in the facilities and departments or units under his or her jurisdiction by ensuring that supervisory employees, reporting to him or her, assume their responsibilities in the application of the programme at their respective levels;
 - b. To ensure that workplace inspections are performed on a regular basis and recommended corrections are addressed appropriately in a timely manner;
 - c. To identify those deficiencies or hazards, which require intervention from the EH&S Office, are brought to the attention of that department and those which require Faculty support are brought to the attention of the Dean;
 - d. To review research grant proposals and new programmes to ensure that the space, service and compliance requirements have been accurately identified, and can be adequately provided, for the intended activity and that the proposed use of hazardous materials or methods has been sent to the appropriate bodies for review and approval;
 - e. To ensure that the students granted permission to be in the department or facility after hours have been adequately informed about the hazards and have been trained in the appropriate safety and emergency procedures;
 - f. To maintain an up-to-date list of certified first-aiders, fire monitors and emergency responders in areas under his or her jurisdiction;
 - g. To ensure that a sufficient number of fully-supplied first-aid kit(s) are available in the department and that all employees are aware of its location and purpose;

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- h. To ensure that employees and students know how to get prompt medical attention for anyone who may be injured or become ill;
- i. To comply with all required reporting procedures and carrying out of all incident investigations;
- j. To ensure that reports of incidents and injuries are reviewed and that appropriate measures are taken to prevent their recurrence;
- k. To participate in the development of information and training programmes on EH&S matters and encourage the participation of employees in the variety of training courses offered by the Environmental Health and Safety Office and Safety Committees;
- l. To encourage and support the activities of the Health & Safety Committee(s) within his or her area.

Faculty Members, Researchers, Instructors, Technicians in Academic Departments and Teaching Assistants

- 21. In their capacity as supervisor of a class, laboratory or university sponsored activity; faculty members, researchers, instructors and teaching assistants shall be expected to take responsibility for the students and other staff under their supervision.
- 22. Faculty members, researchers, instructors, technicians in Academic Departments and Teaching Assistants shall have these specific responsibilities:
 - a. To ensure that students and employees are aware of the safety regulations that apply to them;
 - b. To provide sufficient information, training and supervision to ensure the proper use of material and equipment at all times;
 - c. To provide students and employees with full information on the hazards associated with materials, equipment and methods to be used;

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- d. To ensure that the required safety equipment and personal protective devices are available, maintained and used;
- e. To review experiments, conditions and work practices for health and safety hazards on a regular basis;
- f. Prior to authorizing permission to be in the facility or work area after hours, to ensure that students are competent to be working unsupervised and that they have been adequately informed about the hazards, and trained in the appropriate safety and emergency procedures;
- g. To conduct workplace inspections as frequently as is necessary to identify problems and correct unsafe practices and conditions;
- h. To call to the attention of supervisors any problems identified and ask for corrective action and cooperate fully in working out ways to eliminate these problems;
- i. To ensure that prompt medical assistance is provided to employees, students or visitors who may become ill or injured;
- j. To report immediately to the supervisor and the Environmental Health and Safety Office all incidents or injuries;
- k. To participate in the investigation of incidents and injuries to determine their cause and prevent their recurrence;
- l. To be familiar with emergency procedures which apply to the work area, follow the instructions of emergency personnel, and in the case of an emergency evacuation, assist in the evacuation of their class;
- m. To participate in health and safety meetings and training sessions and, as appropriate, to require the participation of employees and students under his or her supervision;

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- n. To encourage recommendations from employees and students for improving safety within the area and submit such recommendations to his or her supervisor or other appropriate parties;
- o. To cooperate with the Health and Safety Committee in his or her area.

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APPENDIX A

Health and Safety Committees

Central Advisory Health and Safety Committee

1. The CAH&S Committee is a parity committee, which operates within the spirit of Quebec's health and safety legislation and carries out most of the functions prescribed in the Act Respecting Occupational Health and Safety and the Act Respecting Industrial Accidents and Occupational Diseases. While not required to do so by legislation, and in recognition that they are major stakeholders, the Concordia Committee provides for representation from students, in addition to employees and management. Management representatives are appointed by the Vice-President, Services upon the advice of the Academic Deans and the Director of Environmental Health and Safety. Employee representatives are appointed by their unions or certified associations and act as safety representatives for their constituencies.
2. The CAH&S is concerned with a wide range of health and safety issues affecting the University community and will also examine concerns raised by any member of the Concordia Community which have not been adequately resolved at the department level or through the line management system.
3. Subcommittees and task forces are established to deal with specific issues as required. Examples of these are indoor air quality, ergonomics and workplace violence.
4. Recommendations are made to the Senior Administration through the Vice-President, Services.

Responsibilities

5. Identifies the need for training and information programmes in matters of occupational health and safety and takes cognizance of other components of the Environmental Health and Safety Programme and makes recommendations to the administration;

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6. Participates in the identification and assessment of the risks connected with certain workplaces, tasks and functions, and in the identification of contaminants and dangerous substances connected with those workplaces, jobs and functions;
7. Receives notices of injuries and inquires into incidents that have caused, or could have caused a work accident or an occupational disease, and submits the appropriate recommendations to the Vice-President, Services and the Commission de la santé et de la sécurité du travail (CSST);
8. Keeps registers of work injuries, occupational diseases and reports of incidents that could have caused them;
9. Receives suggestions and complaints from students and employees, the certified associations, and the administration, relating to occupational health and safety, and examines, records and answers these suggestions and complaints;
10. Receives and studies the statistical data produced by the EH&S Office, the community health department, and the CSST;
11. Receives and studies the reports of inspections made in the establishment;
12. Provides support to the Director, Environmental Health and Safety in carrying out his or her duties;
13. Recommends the establishment of faculty departmental or area sub-committees as appropriate and receives and reviews reports from them;
14. Under written agreement, carries out any other task which the administration, the employees or their certified association entrust to it;
15. Sends the required information to the CSST.

Department and Faculty Committees

16. The establishment of local committees is required in faculties, academic or service departments where an identifiable risk is present, or when employees or students

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request one. They may also be established at the request of the Director of Environmental Health and Safety or the Central Advisory Health and Safety Committee. They address issues relating to the function, activities and workplaces in which the unit is involved, providing employees and students a direct voice in decision making in health and safety issues specific to the unit in which they are established.

17. They also provide a forum where health and safety issues can be examined and resolved in a cooperative environment.
18. The committee makes recommendations to the Dean, Department Chair or Senior Administrator of the area for which it was created and provides an annual report to the CAH&S.

Responsibilities of Faculty and Departmental Health and Safety Committees

19. Assesses the risks connected with certain jobs and reports these to the departmental chair or unit administrator together with recommendations as to their management;
20. Receives and reviews reports of injuries, incidents and occupational diseases;
21. Participates in investigations, where appropriate, and makes recommendations;
22. Receives, reviews and responds to suggestions and complaints from students, employees and the certified associations relating to occupational health and safety matters;
23. Receives and studies the reports of inspections made in the department and makes recommendations;
24. Carries out regular inspections and makes recommendations for corrective actions;
25. Identifies the need for, and approves training and information programmes, established within the department or designated area;
26. Makes recommendations regarding specific protective devices and equipment which are best adapted to the needs of the workers within the unit;

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27. Carries out any other task which the administration and the employees, or their certified association, entrust to it;
28. Provides an annual report of activities to the department chair or unit head and to the Central Advisory Health and Safety Committee.

Technical Committees

29. Technical committees may be created by the Vice-President, Services to meet regulatory compliance requirements or to address particular problems. Examples of these are the Radiation Safety Committee, the Biohazards Committee and the University Hazardous Materials Committee.
30. Committee members shall be appointed by the Vice-President, Services on the recommendation of the deans, directors or the Director, Environmental Health and Safety on the basis of their knowledge or expertise.