

RESEARCH PERSONNEL PROTECTION POLICY

Safety is a core value at USC. The University is committed to advancement of an institutional safety culture, with strong programs of personal safety, accident and injury prevention, and compliance with applicable environmental and health and safety laws and regulations.

USC commits to making all reasonable efforts to

- Promote occupational and personal health and safety;
- Protect the health and safety of USC students, faculty, staff, and visitors;
- Provide information to faculty, staff, students, and visitors about health and safety hazards;
- Identify and correct health and safety hazards and encourage reporting of potential hazards; and
- Conduct activities in a manner that protects the environment of our workplaces.

Everyone at USC is expected to perform work safely, regardless of their position in the University. For employees, safety is an expectation and, where appropriate, part of their evaluation. Managers and supervisors are further responsible for the safety of the people under their supervision. They are expected to establish and maintain a system of training, positive reinforcement, and escalated discipline to support good health and safety practices.

SCOPE

This policy defines the responsibilities of faculty, staff, students, and visitors toward making USC a safe place to perform work, study, and conduct research. The policy applies to all USC faculty, staff, students, and unpaid visitors working within USC laboratories, USC-owned or -leased sites, and USC-controlled remote field locations, with these exceptions:

- Children's Hospital of Los Angeles, which is responsible for safety in its own facilities;
- LA County Department of Health Services-owned hospitals and clinics, for which the county is responsible;
- Student activities outside of USC owned or leased facilities, when such activities are not directed by a USC faculty or staff member.

In addition to this policy, each member of the USC community is responsible for following all safety responsibilities established by Cal/OSHA or described in USC's Illness and Injury Prevention Program (IIPP), <https://policy.usc.edu/injury-prevention/>. Additional hazard-specific policies and requirements may apply to certain work and learning environments. These are described in the web pages of the USC Office of Research and Office of Environmental Health and Safety (EH&S).

Nothing in this policy shall be construed in a manner inconsistent with existing legal and policy requirements, including but not limited to requirements in federal regulations, medical board regulations, or other applicable laws or regulations.

PRINCIPLES

Responsibility for good health and safety practice begins with the supervisor in the workplace, laboratory or class, supported by their managers as well as safety specialists within Environmental Health and Safety (EH&S). Specifically,

- All supervisors are responsible for taking all reasonable precautions to ensure the safety of their employee, student, and visitor charges, as described by relevant law, regulations, and policy.

- The role of EH&S is generally to provide oversight: they provide safety training and guidance for supervisors, faculty, staff, students, and visitors; mandate training that is essential for promotion of safety; and inspect laboratories and workplaces to assure that environments are consistent with relevant regulations and best practices.
- Supervisors, including faculty, shall be evaluated as to their safety record, i.e. good faith cooperation and compliance in creating a safe work environment, which shall be considered in merit review, appointment, promotion, and tenure where applicable.
- Employees shall be evaluated as to their safety record, which shall be considered in merit review and promotion where appropriate.

RESPONSIBILITIES

Adherence to good health and safety practices and compliance with applicable health and safety regulations are a collective responsibility of all faculty, staff, and students, as well as visitors working within laboratories or shops. Specific responsibilities follow.

Director for Environmental Health and Safety (EH&S)

The Director of EH&S ensures overall institutional compliance with applicable policies, statutes, and regulations; monitors the effectiveness of safety programs; and provides central health and safety services, training, and support to all areas of the University. The Director is responsible for regular, periodic inspections to identify, evaluate, and correct workplace hazards and unsafe work practices, where frequency of inspections is determined according to the hazard present in the particular workplace.

The Director has the authority and responsibility to curtail or shut down any University activity that constitutes a clear danger to health or safety. The Director recommends University-wide health and safety policies to either the Senior Vice President for Administration or the President.

The Director must also ensure that the EH&S organization does the following.

- Reviews legislation, recommends policies, and monitors compliance with environmental health and safety statutes and regulations and University health and safety policies and programs;
- Develops institutional safety and compliance programs and assists schools, departments, faculty, and managers with implementation;
- Provides guidance and technical assistance to supervisors and managers in the schools, departments, and other work units to identify, evaluate, and correct health and safety hazards;
- Develops programs for the safe use of hazardous radiological, biological, chemical substances, and lasers;
- Provide training materials, assistance, and programs that regard safe work practices;
- Creates and promotes a culture of constructive, collaborative, and supportive interactions with faculty and students; and
- Works with University departments charged with primary responsibility for the design, construction, and/or renovation of facilities, to ensure that there is appropriate health and safety review of facility concepts, designs, and plans.

Vice Presidents, Directors, Chairs, Deans, and other Administrators

Senior administrators ensure that individuals under their management have the authority to implement appropriate health and safety policies, practices, and programs; areas under their management have adequate resources for health and safety programs, practices, and equipment; areas under their

management are compliant with USC's health and safety policies, practices and programs; and employees in their organization are evaluated according to their safety records.

Physical infrastructure is a particular responsibility of certain administrators, including but not limited to the Facilities Management Services (FMS) and certain school units that manage buildings and other physical infrastructure. For example, these administrative units are generally responsible for the following.

- Workplaces, including laboratories, and equipment are maintained consistently with regulation and the guidance of EH&S.
- Compliance findings involving physical infrastructure shall be corrected promptly. Typically, this involves deficiencies in buildings and equipment purchased or controlled by the University.
- Helping to ensure that all workplaces and laboratories are compliant with USC's policies, programs, and practices.

Workplace and Laboratory Managers

Workplace managers (e.g. Principal Investigators (PIs), lab instructors, and lab/shop managers) are responsible for taking all reasonable steps to protect the health and safety of employees, students, and visitors working under their direction or supervision, even when those persons are working outside of spaces controlled by their manager, which requires ensuring that:

- Employees, students, and visitors under their supervision or within their work areas have been provided with appropriate safety training and information and adhere to established safety practices, including provision and use of personal protective equipment;
- Employees, students, and visitors are informed about health and safety matters;
- Unsafe conditions are promptly reported to the next higher level of management and to the office of EH&S, as well as to workers who may be affected;
- Employees under their supervision participate in the medical surveillance program as applicable;
- Training occurs when
 - An employee is hired, or student or visitor is new to the laboratory or workplace;
 - An employee, student, or visitor is given a new assignment for which training has not previously been received;
 - New hazards are introduced by new substances, processes, or equipment; or
 - When there is a change in policy or best practice.
- Records are maintained to demonstrate compliance with regulations and standards, specifically
 - Safety meetings;
 - Reports of unsafe conditions or hazards;
 - Accident, injury, or illness investigation reports;
 - Scheduled and periodic workplace inspection records; and
 - Employee training records.
- Laboratory and shop equipment is maintained consistently with regulation and the guidance of EH&S, where the equipment's maintenance is the manager's responsibility. Typically, this regards equipment that was acquired by that manager or PI.
- Regarding PIs who manage shared equipment, the PI who acquired it is responsible to ensure that it is maintained appropriately, transferred to another manager, or disposed. The acquiring PI is responsible whether or not he/she is using the equipment. In the case of a core lab, the core director is responsible to ensure that the core's equipment has an appropriate custodian.

To fulfill these responsibilities, workplace managers must maintain current understanding of USC's health and safety policies, practices, and programs; cooperate with EH&S in any requested inspections

(as if they were compliance investigations); and cooperate with any recommended corrections to remedy hazards.

Faculty, Staff, Students, and Visitors in Labs and Shops

Basic responsibilities applicable to all persons exposed to hazards in the laboratory include the following. These are the responsibilities of individual workers in labs and shops.

- Adhere to health and safety practices;
- Keep informed of conditions affecting their health and safety;
- Participate in safety training programs as required by USC policy or by their supervisors/instructors;
- Report to supervisors, instructors, or EH&S any potentially unsafe practice or immediate danger; and
- Communicate hazard information in areas where hazardous chemicals or physical agents are used or stored. This communication about hazards shall conform to the [Research Policies](#) for laboratory facilities and the [Hazard Communication Program](#) for all relevant workplaces.

HIGH-HAZARD CO-CURRICULAR COURSES AND EXTRA-CURRICULAR ACTIVITIES

USC has a special commitment to assuring student safety in high-hazard environments, which include

- Courses that are determined by EH&S to be bound by this policy. Typically, this will be courses that involve hazardous materials and have a “L” (laboratory) designation in the *USC Catalogue*.
- Student clubs and extra-curricular organizations that expose students to unusual risks, as identified by the Vice President for Student Affairs in consultation with EH&S.
- Workshop spaces available to students that present hazards, as determined by EH&S.

For these situations, a USC employee must be designated by a dean or vice president as the person responsible for assuring student safety. With resources provided by the dean or vice president, that employee is responsible for

- Proper supervision of students participating in activities.
- Student completion of USC General Laboratory Safety Training before commencing activities.
- Cognizance of the chain of responsibility in response to any hazard.

In the case of co-curricular courses, a qualified supervisor must be present, as supported by the responsible dean or vice president. The supervisor may be a teaching assistant, USC staff member, or faculty member knowledgeable in the activities of the course at the time of the course activity. If the immediate supervisor is a teaching assistant, there shall be a USC faculty or staff member present on campus available promptly to assume the supervisory roles of the teaching assistant if needed.

In the case of student clubs, a qualified supervisor must work with the club and EH&S to develop a standard operating procedure for any club activities involving any laboratory or shop work that will take place when the qualified supervisor is not present. A copy of any such standard operating procedures shall be made available to the cognizant dean or vice president.

In the case of co-curricular field trips, the instructor of record for the course is responsible for arranging appropriate laboratory or shop safety training and equipment, if relevant as advised by EH&S, with resources provided by the appropriate dean.

All USC persons engaged in field research should utilize the EH&S Field Research Safety Plan and enforce their plan while in the field.

ENFORCEMENT

USC's Reporting Wrongdoing policy requires all members of the USC community to report suspected violations of this policy. Such violations may be reported to one's workplace supervisor or to EH&S through the "[report a safety concern](#)" portal.

If an individual USC community member seriously or repeatedly fails to carry out any responsibility delimited by this policy, this is conduct in [violation of university policy](#). The violation should be reported to the Vice President of Research, who in consultation with appropriate safety committees where appropriate, will determine if a serious or repeated violation of university policy occurred. If the Vice President of Research determines that such a violation occurred, the matter will be referred to the appropriate sanctioning body, e.g. the Committee on Professional Responsibility, Human Resources Administration, or SJACS, to determine the appropriate sanction.

If an administrative unit of the University (e.g., FMS or a school unit that manages physical infrastructure and resources) fails to carry out any responsibility delimited by this policy, it is the responsibility of the Senior Vice President of Administration or the Office of the Provost, whichever has responsibility for the involved administrative unit, to ensure swift correction. Faculty, staff, or students that are dissatisfied with the resulting administrative action should immediately report the problem to the EH&S and the Vice President for Research.

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