



## Harvard University Environmental Health & Safety Policy

*Latest revision January 2019*

### **EH&S Policy Statement:**

Harvard University is committed to the sound health and safety of our students, staff, and faculty while minimizing our impact on the environment. We are also committed to finding innovative ways to better protect people and the planet and measuring and improving our environmental, health, and safety performance. It is our intent to conduct our operations in adherence with sound environmental, health, and safety (EH&S) practices consistent with Harvard's teaching and research excellence.

Harvard University is a complex organization, consisting of schools with academic and research missions, other affiliated centers and units, and the extensive support functions necessary for the operation of the institution. Consistent with its long-standing philosophy of decentralized management, the University places the primary responsibility for compliance with all applicable laws, regulations, and policies with its individual schools and departments, each under the direction of a responsible "Corporate Officer" (e.g., Provost, Dean, or Vice President). Quality EH&S performance is important to Harvard wherever we conduct our business. Our operations are a model for high-quality environmental, health, and safety practices. The following responsibilities and principles have been established to guide school and department faculty, staff, postdoctoral scholars, and students in their activities at Harvard:

- Minimize hazards to students, faculty, staff, and visitors and our environment;
- Comply with all applicable environmental health and safety laws and regulations, wherever we are operating;
- Evaluate and manage EH&S risks related to our work;
- Measure and monitor EH&S performance;
- Complete requisite training;
- Maintain personal accountability for responsible environmental and safety behavior within the University community;
- Be engaged, report, and question hazardous conditions or potential violations of environmental or safety obligations;
- Promote and encourage sustainability through efficient and appropriate use of resources;
- Recommend improvements to support environmental and safety activities and participate in these efforts; and
- Assure that those who do business with Harvard perform their work in a manner that protects the University from environmental, health, and safety risks.

### **The following supporting guidance is included:**

1. Governance and Program Guidance
2. Roles and Responsibilities
3. Major Management Programs

### **Appendices**

APPENDIX A - Role of the Environmental and Safety Compliance Officer



# Harvard University Environmental Health & Safety Policy

## Supporting Guidance

### 1. Governance and Program Guidance

Below are descriptions of governance and University Standing Committees as well as other committees engaged in the governance and guidance of the University EH&S program:

#### **University Laboratory Safety Committee:**

The university-wide [Laboratory Safety Committee](#) is a governing body empowered to review and approve University policies related to Laboratory Safety, as well as safety training procedures and content. The Committee is made up of Faculty Principal Investigators (PIs), Environmental Safety and Compliance Officers (ESCOs) from lab-based schools, and representatives from a variety of other disciplines across the university. The Laboratory Safety Committee advises the Office of the Vice Provost for Research (OVPR) and EH&S on risk management issues related to laboratory safety, evaluates potential hazards associated with research and teaching activities, and reviews the findings of laboratory inspections conducted by EH&S to ensure safety compliance and to facilitate a culture of safety.

#### **Facilities Safety Committee:**

The Facilities Safety committee is composed of administrators involved in the operation of Harvard's physical plant and infrastructure. This includes representation from schools, departments, and others with building/property management and/or facilities responsibilities. The committee reviews occupational and facilities safety risks and applicable standards (e.g. Fire Safety, OSHA Programs, Training, etc.) The committee also develops implementation strategies for safety plans, procedures and policies, and recommends, develops, and provides feedback on applicable EH&S policies and practices.

#### **Committee on Microbiological Safety (COMS):**

[The Office of Biological Safety facilitates COMS](#), a standing faculty committee that reviews all research involving recombinant and synthetic DNA, wild-type and genetically modified microorganisms, bacterial and viral pathogens, prions, regulated biological toxins, human and non-human primate tissues, cells, cell lines, human gene transfer and xeno-transplantation, as well as the creation of transgenic animals and plants, and biohazards at Harvard and some Harvard-affiliated institutions.

#### **Radiation Safety Committee:**

[The Radiation Safety Committee](#) is the governing body for all aspects of radiation protection within the university, including all affiliated research, instructional and service units using ionizing and non-ionizing radiation sources or devices (e.g., lasers, x-rays, collectively referred to as "radiation sources") in facilities owned or controlled by the University. The Committee ensures that all possession, use, and disposition of radiation sources at Harvard University complies with pertinent federal and state regulations and with the specific conditions of university licenses, and that all concomitant radiation exposures are maintained As Low As Reasonably Achievable (ALARA).



### **Institutional Animal Care and Use Committee (IACUC):**

Harvard has two IRB offices that oversee animal use protocols:

- [Faculty of Arts and Sciences \(FAS\) maintains an Institutional Animal Care and Use Committee \(IACUC\)](#) as required by the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals. Animals are maintained in accordance with the "Guide for the Care and Use of Laboratory Animals" (National Research Council, 8<sup>th</sup> edition, 2011), and all animal protocols must be approved by the IACUC.
- [The Harvard Medical School \(HMS\) Institutional Animal Care and Use Committee \(IACUC\)](#) oversees the responsible use of animals in research and instructional activities for HMS and the Harvard Chan School of Public Health. The IACUC reviews protocols, reviews the animal care and use program, and monitors the animal facilities to ensure compliance with standards and regulatory requirements.

### **Institutional Review Board (IRB):**

Harvard has two IRB offices that oversee human research activities:

- [Committee on the Use of Human Subjects in Research \(CUHS\)](#), Harvard University-Area (HUA), reviews projects from FAS, GSE, HKS, HBS, HLS, SEAS, GSD, HDS, and the Radcliffe Institute.
- The [Office of Human Research Administration](#), Longwood Medical Area, (OHRA LMA), handles projects that are reviewed by the HMS/HSDM IRB, the Committee on Human Studies, and the HSPH IRB.

Harvard's IRBs are governed by the [Statement of Policies and Procedures Governing the Use of Human Subjects in Research at Harvard University](#).

### **Other**

There are other Committees that have less common EH&S connections which are not included at this time.

## **2. Roles and Responsibilities**

### **Environmental Health and Safety Office (EH&S)**

The EH&S Office within Campus Services administers Harvard's EH&S Programs. EH&S supports the University's mission of teaching and research by promoting a culture of safety, health, environmental protection, and emergency management. EH&S' customers include students, faculty, and staff, as well as the broader community and environment around us. The EH&S office strives to fully understand its customers, and to develop services specific to their needs in four primary areas – Buildings and Facilities, Laboratories, Emergency Services, and Project Support. In matters of regulatory compliance and safety, EH&S is authorized by the University to protect personnel and the environment. EH&S is legally responsible for numerous permits, plans, regulatory filings and related matters, and works in collaboration with schools and departments to maintain effective standards and practices.



EH&S implements this responsibility through close collaboration and consultation with University clients, and by providing technical, regulatory, and related management expertise. Core services provided to the University community include:

- Identifying and assessing potentially hazardous operations and locations;
- Evaluating existing or emerging environmental, health, and safety risks, regulatory requirements, standards, and best practices;
- Developing institutional EH&S and emergency management risk mitigation strategies;
- Providing training and awareness information to employees and students;
- Monitoring hazards and risks, and auditing of control strategies;
- Operating University systems that facilitate training, inspections, monitoring, records, data and reporting, and University EH&S metrics;
- Being the liaison to Environmental and Safety Compliance Officers (ESCO), faculty, administrators, University committees, and others involved in management of environmental health and safety risks at Harvard;
- Serving as the University's primary liaison to environmental, health, and safety regulatory agencies;
- Coordinating the University's response to regulatory agencies in matters of investigations, employee or community member complaints, or potential or actual regulatory enforcement actions by consulting with schools, departments, affiliated units and the Office of the General Counsel to ensure a unified and consistent University response.

EH&S also provides specialized, or dedicated, operational services to schools and departments through expense recovery arrangements.

### **Schools, University Departments and Affiliated Units**

It is the responsibility of the Senior Corporate Officer (e.g., Vice President, Dean) of each school, administrative department, and affiliated unit to ensure their operations are conducted in accordance with all applicable laws and regulations, and to locally implement the University's environmental, health, and safety programs in support of this policy.

With the guidance and support of EH&S, these responsibilities include, but are not limited to:

- Ensuring appropriate training;
- Informing employees, students, and visitors about workplace hazards and safety procedures;
- Conducting inspections and audits;
- Correcting and resolving problems or violations;
- Investigating incidents and complaints by employees, students, and others;
- Ensuring proper management of hazardous materials;
- Implementing policies (including appropriately escalating issues of employee and student nonconformance with environmental health and safety requirements)
- Appropriately documenting activities and processes, and data collection; and
- Managing response to emergencies by obtaining, as needed, the assistance of appropriate internal or external resources.



Each school, administrative department and affiliated unit maintains financial and operational responsibility for day-to-day management and implementation of its environmental, health, and safety programs. This includes support of specialized or ongoing operational services provided by its employees, EH&S or others, responsibility for fines or penalties assessed by a governmental agency, remediation costs, and damages and expenses incurred as a result of judicial or administrative proceedings.

### **Environmental and Safety Compliance Officers**

Each Senior Corporate Officer shall appoint an Environmental and Safety Compliance Officer (ESCO) with responsibility for implementation, management, and reinforcement of environmental, health, and safety programs within the school, administrative department, or affiliated unit. The Dean or Vice President shall issue a letter of appointment outlining the authority and responsibility of the ESCO.

The ESCO shall have the authority to:

- Act on behalf of the Senior Corporate Officer to manage environmental, health, and safety activities in the school or department;
- Establish procedures, investigate complaints and incidents, and audit performance;
- Require cessation of any activities that may pose an imminent hazard to persons, property or the environment; and
- Commit financial and staff resources to ensure continued compliance with applicable environmental, health, and safety regulations.

Duties of the ESCO role are further defined in Appendix A.

### **Principal Investigators and Unit Managers**

Principal Investigators and Unit Managers have the responsibility for the implementation, management, and enforcement of a safe and compliant environment within their area of responsibility. Primary responsibilities include the development of appropriate environmental, health, and safety procedures, periodic self-inspections, staff training, and incident reporting.

## **3. Major Management Programs:**

### **Assessment:**

EH&S, schools and administrative units use a collaborative approach to assess hazards and determine applicability of various regulations to their operations. The EH&S office has internal expertise to accomplish most regulatory and program assessments and will coordinate the hiring of special experts when a hazard or program assessment is beyond EH&S' capability. Once protective programs and necessary compliance programs are identified, a management plan and supportive organization can be developed and assigned.

EH&S will query data from schools and administrative units from time to time to prepare regulatory required reports and shares the data with schools and administrative units.



**HARVARD**

Campus Services

ENVIRONMENTAL HEALTH & SAFETY

The Campus Services EH&S office is responsible to track regulatory changes and communicate the changes as well as projected impacts across the University. EH&S accomplishes this through its network of ESCOs, and its network of staff embedded throughout the University.

### **Training:**

EH&S has adopted a layered training approach: The Harvard Training Portal serves as the baseline for training on compliance programs and more simplified EH&S awareness. EH&S facilitates or provides classroom style training on issues which need to be more interactive for effective learning. Laboratories and facilities themselves provide what EH&S calls “apprenticeship” training which is hands on, mentor to mentee level training on actual local practices. Finally, EH&S or individual schools and administrative units may need to hire very specialized training expertise for some specialized programs or equipment. In these cases, EH&S will try to use the Harvard HTP to track worker attendance in these trainings.

The Harvard Training Portal Provides a robust reporting capability and can assist departments and schools in tracking employee and student training completion.

### **Inspection findings, Nonconformance, and Incident Management:**

The University has the responsibility to investigate and appropriately report environmental, health, and safety incidents or program non-conformance.

Employees, students, and others affiliated with the University have the responsibility to disclose any activity that may be, or may result in, a violation of any environmental health and safety regulation.

All personnel should immediately notify appropriate emergency responders (e.g. Harvard University Police Department [HUPD], local public safety, local fire department, University Operations Center, or others) of any situation that may result in an imminent hazard to persons, property or the environment. Additional notification must be made to the ESCO or unit manager. If the ESCO is not available, incidents should be reported to the Director of EH&S.

Schools and departments retain authority and responsibility for emergency management planning and response, consistent with the University Emergency Management Plan. In emergencies, schools and departments will utilize their Local Emergency Management Teams (LEMT) for incident notification, response, and recovery. They may engage the resources of internal services providers (e.g. HUPD, EH&S, University Operations Center, UHS, etc) and external service providers as appropriate.

EH&S provides regulatory liaison, technical assistance, and operational guidance as requested or required, and works with the school and emergency responders to establish safety and other criteria for resumption of normal operations. EH&S will escalate compliance of safety, health, or environmental issues to various management staffs, including the ESCO, when EH&S cannot resolve an issue in partnership with local laboratory or administrative staff.

All employees, students and others affiliated with the University are expected to fully cooperate, and participate as appropriate, in the investigation and remediation of any incidents.



Employees and students who report incidents in accordance with law and Harvard University procedures, or who raise questions or concerns about the University's environmental health and safety procedures, will not be penalized by Harvard, and such action will not be recorded in the employee's or student's record.

**Program Conformance:**

Harvard University views compliance with all laws, regulations, and University policies as conditions of employment, and of academic eligibility. Violation of such requirements shall be considered grounds for University action, including termination of employment and/or enrollment status. The Corporate Officer has the responsibility and authority to implement such actions.

Governmental agencies have established strict policies to ensure compliance with environmental, health, and safety regulations, including civil penalties and individual criminal penalties leading to possible prosecution, imprisonment, and substantial fines. Accordingly, the University expects all faculty, staff, postdoctoral scholars, and students and University affiliates to be vigilant in complying with all environmental, health, and safety requirements, and to acquire the information they need to properly conduct their activities at the University.



## **APPENDIX A - Role of the Environmental and Safety Compliance Officer**

Each Senior Corporate Officer will appoint an Environmental and Safety Compliance Officer (ESCO) who will have authority and responsibility for implementation, management, and enforcement of environmental health and safety compliance programs within the school, administrative department or affiliated unit.

A primary responsibility of the ESCO is to establish the internal management, accountability and communication structures to implement and track environmental and safety requirements, status and related risks. The Compliance Officer will rely upon the support and guidance of EH&S in implementing these responsibilities.

### ESCO Duties:

- seek the technical assistance and guidance of EH&S in understanding risks, risk mitigation strategies, and environmental and safety requirements for the school, department or affiliated unit;
- establish mechanisms (e.g. local safety committees, lab safety officers, facility manager networks) to implement and monitor compliance requirements;
- ensure that personnel attend required training;
- take appropriate action to halt any conditions that may result in imminent hazard to persons, property, or the environment;
- notify the Senior Corporate Officer of unresolved compliance issues and situations involving potential safety hazards, exposures, accidents, injuries, illnesses, spills, releases or other regulatory or environmental issues;
- notify the EH&S Director of any unresolved compliance issues and situations, and seek EH&S guidance in implementing corrective actions as needed; facilitate and promote the exchange of information within the school or department and with EH&S in the interest of collaborative problem solving and program improvement;
- represent the school or department on the EH&S Facilities, Safety Committee, Laboratory Safety Committee, or both and participate in the development of strategies, policies and procedures for environmental and safety compliance management at Harvard; and
- Provide an annual briefing to the Senior Corporate Officer and the Director of Environmental Health and Safety on the school or department's environmental and safety program status, trends and risks.