



Smithsonian
Institution

SMITHSONIAN DIRECTIVE 419

October 30, 2006

SMITHSONIAN INSTITUTION SAFETY AND HEALTH PROGRAM

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Purpose

This directive sets forth the policy of the Smithsonian Institution to provide a safe and healthful environment for its staff, volunteers, visitors, and collections. The policy is consistent with the requirements of the following:

- the Occupational Safety and Health Act of 1970;
- Executive Order 12196, Occupational Safety and Health Programs for Federal Employees;
- National fire codes published by the National Fire Protection Association (NFPA);
- the Environmental Protection Agency (EPA);
- the Nuclear Regulatory Commission (NRC); and
- other applicable federal, state, and local safety and health regulations

Scope

The provisions of this directive apply to all Smithsonian staff, volunteers, and other individuals working, and collections housed, in Smithsonian-owned, leased, or operated facilities.

Policy

It is Smithsonian Institution (SI) policy to:

- avoid loss of life, personal injury or illness, property loss or damage, or environmental harm, by or to

Policy (continued)

- employees in the course of duty
- comply with applicable laws and regulations of federal agencies (e.g., the U.S. Department of Labor's Occupational Safety and Health Administration, EPA, NRC, and U.S. Department of Transportation), to the extent that they exercise regulatory authority over the Smithsonian in specific functional areas, as well as with internal SI safety and health requirements. In the event of conflicting laws or regulations, the more protective or stringent reasonable requirements will be met
- comply with applicable building codes and professional and industry standards such as those published by the American National Standards Institute, NFPA, or International Code Council for new construction and remodeling projects, consistent with SD 410, Facility and Construction Improvement Projects. In addition, the Smithsonian will make bona fide attempts to bring existing structures into compliance with current applicable codes and standards, as long as these efforts do not pose an unreasonable burden on SI operations
- instill an awareness of the need for safe and healthy work practices in all SI employees, interns, visiting researchers, and volunteers, and require SI contractors to emphasize safety and health practices and principles to their employees
- require each SI unit to establish, implement, and promote safety and health in the course of all operations. The SI goal is to have zero occupational injuries and illnesses
- establish safety and health management performance indicators and metrics that measure, assess, and guide progress toward the achievement of safety and health objectives
- review and evaluate all SI plans, systems, programs, facilities, equipment, processes, and activities on a periodic basis to ensure that fire-protection, safety, environmental, and health objectives are achieved
- develop and maintain a management information system for tracking and advancing goals of the SI safety and health program

Policy (continued)

- ensure that all alleged hazardous conditions are investigated, that identified safety and health risks are properly assessed and controlled, and that pertinent close-call and lessons-learned situations are promptly publicized to prevent recurrences
 - encourage employees to report workplace hazards, and to ensure that no employee is subject to restraint, interference, coercion, discrimination, or reprisal for exercising his or her rights to report unsafe or unhealthful conditions in the SI workplace
 - reinforce the Smithsonian's commitment to safety and health by highlighting details of the Institution's safety and health programs, and periodically preparing and distributing SI safety and health information to staff at all SI facilities and locations
 - establish safety awareness motivation programs within the Smithsonian to educate employees about the need to prevent human errors and omissions that could impact the safety and mission success of the Institution
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Administrative Control

The SI Office of Safety, Health, and Environmental Management (OSHEM) has primary responsibility for providing overall staff direction, execution, planning, promotion, and technical supervision of the SI occupational safety and health program.

Roles and Responsibilities

The Secretary of the Smithsonian maintains overall responsibility for providing each employee, volunteer, and visitor with an environment free from recognized hazards that may cause death or serious physical harm.

The Deputy Secretary and Chief Operating Officer, Under Secretaries for Art and Science, and other Secretarial-level officials are responsible for providing their units with adequate budgets and staff to implement the occupational safety and health program at all operational levels. They are also responsible for ensuring that their units comply with the policies contained in this directive.

**Roles and
Responsibilities**
(continued)

The Director, Office of Facilities Engineering and Operations (OFEO), is the Designated Agency Safety and Health Official (DASHO) for the Smithsonian, and is directly responsible to the Deputy Secretary and Chief Operating Officer for the organization, administration, and implementation of the SI occupational safety and health program.

The Director, OSHEM, exercises managerial control over OSHEM operations, and has primary responsibility for the overall staff direction, operation, planning, promotion, and technical supervision of the SI occupational safety and health program. The Director, OSHEM, is the “Authority Having Jurisdiction” for the Smithsonian, as defined and used in the National Fire Codes, and is the designated fire code official (also referred to as the “Fire Marshal”) as defined and used in the International Fire Code. As such, the Director, OSHEM, is responsible for:

- establishing, developing, and directing the overall SI occupational safety and health program and priorities
- developing long-range plans to coordinate occupational safety and health program considerations with other management goals
- developing and interpreting new program regulations and standards
- conducting independent reviews, surveys, staff visits, and spot checks of SI facilities
- terminating any operation that presents an immediate and unacceptable risk to personnel, property, or mission operations
- notifying senior management immediately at the affected museum, research center, or office when an operation must be terminated due to an unacceptable risk
- reviewing exhibit, construction, improvement, and alteration projects, as well as occupancy changes, to ensure SI conformance with all aspects of life-safety, fire-protection, general safety, and environmental regulations

Roles and Responsibilities
(continued)

- granting, to the extent permitted by law, modifications to safety, environmental, and fire regulations, where the strict conformance with the regulation is not feasible, and the modification meets both the intent or purpose of the relevant regulations and does not lessen the health, life, or fire-safety requirement
- planning, developing, and administering policies and procedures for the SI safety, fire-protection, environmental, and health programs within the framework of federal, state, and local laws, regulations, and standards
- directing investigations of accidents, injuries or illnesses, fires, chemical spills, environmental incidents, and other unusual issues or occurrences
- establishing program priorities for elements of the SI occupational safety and health program
- evaluating compliance with SI safety and health program requirements and priorities, by directors of Smithsonian museums, research centers, and offices
- conducting quarterly program information meetings for SI safety coordinators, and supporting the program activities of the safety coordinators and safety committees
- witnessing acceptance tests for newly installed or modified fire-protection and life-safety systems
- administering the SI Occupational Health Services programs to assess, monitor, and evaluate employee health as it relates to the workplace

Directors of museums, research centers, and offices establish, budget for, and implement an occupational safety program within their buildings, facilities, or offices, and ensure that these programs are consistent with applicable federal regulations and Smithsonian policies, standards, and procedures. Specific responsibilities are outlined in the *SI Safety Manual*, an electronic copy of which can be obtained at http://ofeo.si.edu/design/dm_guide/codes_standards.asp#safetyhandbook or by contacting OSHM directly. These responsibilities include appointing, in writing, a senior staff member to serve as the safety coordinator for his or her unit. Each

Roles and Responsibilities
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director is also responsible for establishing a safety committee to ensure the effective implementation of the SI safety program at the museum, research center, and office level.

SI units are responsible for providing necessary funding and personnel, sufficiently trained and qualified in accordance with the *SI Safety Manual*, to assist them in administering their safety programs. For units with personnel strengths in excess of 200 employees and/or with injury rates greater than the Smithsonian-wide injury rate, the recommended levels of resources include full-time safety personnel.

Supervisors ensure employee compliance with the SI occupational safety and health standards, policies, and procedures set forth in this directive, the associated *Safety Manual*, and in guidance issued by OSHEM with respect to the SI occupational safety and health program. Among other responsibilities outlined in the *SI Safety Manual*, supervisors will, to the extent of their authority:

- receive initial and periodic supervisory safety training to assist them in fulfilling their safety, health, and environmental management responsibilities
- evaluate and assess all workplace and operation safety issues through the Job Hazard Analysis process
- furnish SI employees with working conditions and a place of employment free from recognized hazards that may cause death, illness, or serious physical harm
- evaluate the need for and require or enforce the use of approved personal protective equipment, safety equipment, and other devices necessary to protect SI employees
- train employees in safe work practices
- report any SI employee job-related injury or illness to the appropriate safety coordinator

Employees have a responsibility to themselves and to the Institution for their safety and the safety of others. SI employees must comply with the Smithsonian's

Roles and Responsibilities
(continued)

occupational safety and health standards, rules, regulations, and guidance that apply to their own actions and conduct. These include:

- using safety equipment, personal protective equipment, and other devices and procedures as directed for their protection
- using all machinery and equipment in a safe manner
- reporting any accident, injury, unsafe, or unhealthful condition to their supervisor

Safety coordinators are responsible for administering the day-to-day SI occupational safety and health program for their buildings, facilities, and offices, as outlined in the *Safety Manual*, and for coordinating these activities with OSHM. To prepare for these responsibilities, safety coordinators will receive the minimum training described in the *Safety Manual* within three months of their appointment.

Safety Policies

The provisions of the *SI Safety Manual* implement and supplement the occupational safety and health standards and requirements contained in regulations including, but not limited to: *29 Code of Federal Regulations* (CFR) 1910, Occupational Safety and Health Standards; 29 CFR 1926, Safety and Health Regulations for Construction; 29 CFR 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters; 40 CFR, Protection of Environment; 10 CFR, Energy; and the National Fire Codes.

Where more stringent occupational safety and health standards are set forth in these requirements and regulations, the more stringent standards may apply.

Disciplinary Policies

All applicable occupational safety and health-related regulations, codes, policies, rules, procedures, and plans in effect at the Institution must be followed. Upon notice of a violation by an SI employee of any of the Institution's safety requirements, the employee's

Disciplinary Policies
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supervisor will draft and implement a plan with specific steps to correct the problem.

Supervisors should take immediate disciplinary action, consistent with the disciplinary policies set forth in SD 212, *Federal Personnel Handbook*, and SD 213, *Trust Fund Personnel Handbook*, against any employee who willfully or knowingly violates any SI safety requirement. The severity of the penalty should be commensurate with the severity of the safety violation. Possible disciplinary actions include a verbal and/or written reprimand, probation, suspension, or termination. Penalties for employees covered by union agreements should be within the guidelines established in those agreements.

CANCELLATION:

SD 419, August 17, 2004

INQUIRIES:

Office of Safety, Health, and Environmental Management (OSHEM) – Office of Facilities Engineering and Operations (OFEO)

RETENTION:

Indefinite. Subject to review for currency 24 months from date of issue