Work Off-Site

Work Off-Site, other than teleworking on a computer, during the COVID-19 pandemic will require approval by the EHS Liaison and Division Deputy for Operations. Contact your Division Safety Coordinator for guidance. Off-site locations may require compliance with local and institutional requirements.

Supervisors, Principal Investigators, and WPC Activity Leads have an obligation to be aware of the safety conditions and requirements their people (employees, students, or affiliates) may encounter while working off-site on LBNL projects. ATAP expects all personnel working off-site to continue to implement Integrated Safety Management by:
- Planning and defining the scope of your work before you begin;
- Analyzing the hazards;
- Developing and implementing controls;
- Performing the work within controls; and
- Continuously assessing safety conditions, seeking feedback from safety staff, and making improvements as needed.

Sites with equivalent safety programs — Workers working at non-LBNL facilities having local health and safety programs equivalent to LBNL’s (e.g., other National Laboratories or UC Berkeley) must conform to the requirements of their host institution.

Sites without equivalent safety programs — If there are no local health and safety programs equivalent to LBNL’s, workers must conform to the LBNL requirements. Berkeley Lab Work Planning and Control Activities may be used for planning and authorizing work for Berkeley Lab personnel working at off-site locations that do not have existing authorization processes.

Planning off-site work — The first step is to notify the ATAP ES&H Coordinator and EHS Liaison of the nature and scope of the project. This notification should be made as soon as possible during the proposal stages of the project. Hazard assessment should be performed for work other than attendance at conferences and meetings, such as laboratory, shop, industrial, or fieldwork. Where personal site visits are not practical, information can be obtained by discussions with safety and research personnel at the host site and the people who are working off-site. The ATAP ES&H Coordinator and LBNL EHS personnel may assist in the assessment of hazards and controls.

Logistics for safe off-site work planning should address:
- How to send people and equipment to and from the site. Please note that in addition to safety, LBNL security, export control, and property management requirements must be addressed.
- Using or monitoring third-party equipment at the site. Consider the availability or lack of safety infrastructure and support when plans go wrong.
- Off-site operations planning should include material-handling considerations for accessing, setting up, and taking down off-site equipment.

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- Responsibilities and procedures for managing waste materials.
- Contingencies for different or substandard utilities also should be made (e.g., nonconforming electrical wiring).
- Procedures for contacting emergency support personnel.

**Work Authorizations** — Any LBNL safety Work Authorizations that are required must be approved by the appropriate LBNL safety professionals prior to initiation of the work. Some work may require authorization of jurisdictions other than LBNL or DOE. Any work involving boating, diving or aviation (including drones) will require special authorizations. Any work off-site that may involve radiation exposure requires advance notification of LBNL Radiation Protection and authorization to perform the work.

**Training** — Discuss your training with off-site safety staff and ensure you have completed all required training to do the work. All LBNL people working on LBNL projects at off-site locations are required to adhere to training requirements as stipulated by the host institution or existing Memorandum of Understanding (MOU). In the absence of an MOU or host institution requirements, LBNL requirements must be completed. These requirements can be identified by a work authorization, such as a WPC Activity or equivalent system, or formal authorization. In some cases, facility or procedure-based safety training specific to the location will fulfill an LBNL training requirement. [NOTE: DOE requires **EHS0470 General Employee Radiation Training** for anyone listed in the LBNL Human Resources database, regardless of work location or badge status.]

**Hazard Controls and Stopping Work** — Hazard controls should follow safety rules (LBNL or host site, whichever is more protective), except where LBNL-equivalent requirements are prohibited or impossible to implement at the off-site location. **If you are asked to do anything you believe is unsafe or to work under unsafe conditions off-site, you have the right and obligation to stop work and contact LBNL for guidance.** If you become aware that there may be circumstances when you could be working alone and hazards remaining after controls could incapacitate you so that you could not self-rescue or activate emergency services, the work must be stopped and these concerns brought to the immediate attention of your host site safety personnel and LBNL supervisor and WPC Activity Lead for resolution before the work may resume.

**Emergency procedures and notifications** -- Ensure that you are familiar with the emergency response and accident reporting procedures at the host site. **If you become injured or ill during off-site work, first obtain any urgently needed first aid or medical treatment, then as soon as you can, call LBNL Health Services at 510-486-6266 and your Supervisor to inform the Lab of your situation.**
Telecommuting

COVID-19 has sparked a change in thinking about telework that is expected to continue into the future. Employees are responsible for maintaining a safe telework environment, including safe ergonomics. HR Telecommuting Agreement/Expedited Telework Agreement is no longer required. ATAP has integrated telework hazards and controls into existing office work/computer work Activities for each Program or group. A new on-line training Course (EHS0054) is required to be completed by any worker who is teleworking.

EHS0059/58 Office Ergonomics Self Assessment/Annual Refresher are still required to be completed by employees who are working on the computer at least 4 hours or more on a regular basis. These courses are set up to be completed at the primary work location; where work is performed more than 50% of the time. This could be a Lab location or telework location—whichever is the primary location.

Employees who are experiencing discomfort or require assistance regarding their ergonomic needs are encouraged to request an evaluation with the EHS Ergonomics team or their division’s ergo advocates. Home office evaluations can be provided via Zoom. It is helpful to email pictures of the employee and the work station set-up to the evaluator prior to the evaluation, if possible. Employees should report work-related discomfort to their supervisor, Health Services and/or EHS Ergo Team. Employees should report any safety issues or concerns specifically related to telework to their supervisor.

Telecommuters are encouraged to take advantage of ergonomics support services as described on the ergonomics web page at: https://ergo.lbl.gov/ and https://ergo.lbl.gov/home/covid-19-resources-from-the-ergo-team

An ergonomics telework catalogue has been created to facilitate ordering of approved ergonomic equipment for home use. Any equipment provided to Employee by LBNL remains the property of LBNL, and must be returned when the employee plans to discontinue teleworking. See the telework equipment return policy at: https://procurement.lbl.gov/welcome-to-procurement-property/property-management/