

CHAPTER 2

HOW TO ESTABLISH AN EFFECTIVE ENVIRONMENTAL, SAFETY AND HEALTH PROGRAM

Any insurance carrier, shrewd business person or safety professional will tell you that the key to preventing harm to school employees, students and the environment is to establish a good environmental, safety, and health program.

A good program may take years to put in place. Do not get discouraged if you are just beginning. You can start with the guidelines below. Use the items next to the boxes to create a checklist of your progress. Start with individual items or parts of items. The guidelines are divided into five sections:

- Assure management commitment;
- Assure employee/student involvement;
- Identify and prioritize potential hazards;
- Eliminate hazards; and
- Train employees, students and management.

The environmental, safety and health program will have to be tailored to your particular needs. The program may be district-wide or developed solely for vocational-technical education and career orientation classes, depending on school resources. Some small school districts with limited resources have formed health and safety cooperatives with other districts to help manage all or parts of their program.

Assure Management Commitment

- Top administration must be involved. The school board, superintendent, school principal, and top school administrators should all be leaders in implementing the program. They should stay informed and involved.

- Develop a written safety and health policy. Top administration should issue a written policy supporting a safe and healthy environment in the schools. This may take the form of one or more policy statements, or a policy manual that covers issues ranging from safety procedures to energy conservation. It should be posted and/or issued to all employees and students.

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The New Jersey Department of Education, Office of Vocational-Technical and Career Education Programs, requires a written plan for a safety and health program under N.J.A.C. 6A:19-6.5. The following plan regulations were last changed in 2006 with some new additions and reorganization of the language:

The safety and health plan shall contain, as a minimum, the following:

1. A statement of the general policies for the safe and healthy operation of all vocational programs, courses and structured-learning experiences;
2. The individuals and/or groups responsible for implementing the safety and health plan;
3. District board of education objectives for the safety and health plan;
4. The procedures required for conducting a safety and health hazard analysis for each career and technical education course and/or program in operation, including, but not limited to:
 - a. Periodic inspections and maintenance of facilities, tools, machines, equipment, personal protective devices, hazardous substances, and for the elimination of potential or identified hazards; and
 - b. Specific statements of practices and precautions required for safe and healthy operation within each course;
5. Emergency procedures to be followed in the event of an injury, illness, hazardous spill, fire or other emergency situation involving a student, teacher or any other individual;
6. Methods to be used to ensure that all career and technical education students are provided safety and health education and training. Such education and training shall include, but not be limited to, the following:
 - a. Hazards and hazardous equipment, supplies, and materials associated with the course and/or program, including methods for incorporating the results of hazard analysis;
 - b. Safe practices and precautions to be used to prevent injury and illness; and
 - c. Procedures and methods to be used to document and assess students' knowledge of safety and health practices and procedures;
7. A system, which may include disciplinary action, to ensure that students comply with safe and healthy practices;
8. Procedures to ensure that all new career and technical education staff and students receive appropriate initial safety and health program training prior to working or participating in any career and technical education course or program; and
9. Procedures required for the investigation all reportable incidents under 6A:19-7.5, and implement corrective action, where possible.

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- Assure adequate personnel resources. Assign responsibility for the functions listed in the remaining sections of this chapter to specific and appropriate individuals. Make sure these individuals have, or are given, adequate time to do the job. Too often environmental and safety responsibilities are wrongly "dumped" on someone who is either 1) extremely competent and, therefore, already overloaded, 2) someone who is unmotivated, or 3) someone who does not have adequate skills to do the job. The regulations in N.J.A.C. 6A:19-6.5 require each school district to designate a person other than the chief executive and/or chief administrative officer to be responsible for implementing the safety and health program.
- Assure adequate financial resources. Money must be allocated for the functions described in the rest of this chapter. Make sure the appropriate parties (school board, administration, teachers) plan for environmental and safety needs during the budget process.
- Evaluate Program performance regularly. The environmental, safety, and health program should be a part of all school performance reviews, including those of top administration, those of teachers, and even student evaluations. **Acknowledge those who have been involved in identifying and correcting hazards and working safely.**

Assure Employee Involvement

- Establish a Hazard Prevention Committee. A Hazard Prevention Committee should be composed of representatives of management, school employees and perhaps, students. This Committee can:
 - take on many of the functions, described below, that are too much for any one individual;
 - get immediate input from all areas of the school, such as the classroom, maintenance, and purchasing;
 - brainstorm more creatively than any one individual, by combining and modifying ideas from many perspectives;

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- improve communication and, therefore, reduce wasted time due to conflicting views and reports; and
- prioritize hazard controls, training, and other activities in a way that is satisfactory to all parties.

For a Committee to succeed, it must be selected carefully, have a clear idea of its mission, power, and functions, and know how to conduct effective meetings. "**Guide to Effective Joint Labor/Management Safety and Health Committees**" is an excellent resource for establishing and improving existing Hazard Prevention Committees in public schools. It is available for free from the New Jersey Department of Health and Senior Services and can be ordered online at <http://www.state.nj.us/health/eoh/odisweb/ohsorderform.htm>. (See **Appendix A: Resources** for additional contact information.)

- Communicate regularly. Use newsletters, bulletin boards, pay check envelopes, and class time to communicate new procedures, new safety assignments, and new committee members. Keep the program on peoples' minds. Make safety and the environment a regular item on the agenda of staff, board, union, and PTA meetings. Post Committee minutes, reports, surveys, and, especially, memos referring to solutions to problems and achievements.
- Develop a hazard reporting procedure. Students and employees should be encouraged to look for and report potential hazards. They need a form and a designated person to whom they can return it.

Identify and Prioritize Potential Hazards

The following functions should be performed on a regular basis by individuals or Committee members assigned to the task. You may wish to keep computerized records of these activities.

- Complete the checklists in the Safe Schools manual. **Chapter 3 - Implementing a Checklist Program** will assist you in using them. The checklists can help you to identify hazards and determine whether or not your shop is in compliance with health and safety regulations. Completing the checklists will also help you comply with the

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N.J.A.C. 6A:19-6.5 requirement that a "safety and health hazard analysis" be done "for each vocational course and/or program in operation."

- Conduct walkthrough inspections. Using the checklists also provides an opportunity to interview employees and students about their concerns. Let them know the outcome of previous concerns and hand out new hazard report forms. For ideas on ways to use the checklists in this manual to teach students, see **Appendix B: Using Safe Schools to Teach Students About Occupational Safety and Health.**
- Maintain and update a chemical inventory. As part of your responsibilities under Right to Know, SARA Title III, and State hazardous waste regulations, you will need to keep track of all chemicals, the amounts being used, their disposal, and spills or releases on the premises.
- Maintain and update a process and equipment inventory. Keep track of the location of hazardous processes or equipment and dates when maintenance or monitoring must be performed. Also keep an inventory of safety equipment and to whom it is issued.
- Establish a procedure for purchasing goods and services and leasing new space. It is far easier to avoid a hazard than to control it once it is in place. Develop a system whereby your purchasing department has any questionable chemicals, equipment, or services reviewed by a safety representative or Committee member prior to purchase. Similarly, review plans for renovating, constructing, or leasing new facilities.
- Investigate accidents, near misses, spills, and releases. Accident and chemical release report forms should have a space to answer, "What were the causes of the accident or release?" and "What precautions or controls could have prevented the accident or release?" A safety representative or Committee member should investigate every accident or release to determine how to prevent such a problem in the future. Employees and students should be encouraged to report near misses as well.
- Review injury and illness records. First reports of injuries, the PEOSH Log 300 data (a required employee occupational illness and injury record keeping system), personal injury claims, and workers compensation claims should be reviewed to identify whether certain classrooms, buildings, or processes pose an excess risk.

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- Review environmental records. Look at the Right To Know inventory, air permits, hazardous waste records, solid waste records, and medical waste records to identify chemicals or processes that should be substituted, recycled or prevented.
- Order and review environmental, personal, and biological monitoring data. A few processes in vocational-technical education programs may require air monitoring, environmental sampling, or biological monitoring of employees' blood or urine. Consider getting outside expertise to determine which procedures to use. **Appendix A: Resources** can help you identify ways to locate the appropriate consultant.
- Arrange for medical screening. A few processes in vocational-technical education programs may require medical screening. In particular, all employees and students who wear respirators should be evaluated by a physician to determine if they are fit to wear one. Those exposed to excess noise need hearing tests. Video display operators should get regular eye exams. As with the guideline above, consider getting outside expertise to determine which screening tests to use. Refer to **Appendix A: Resources** for ideas on locating consultants.

Eliminate Hazards

The following functions should be performed by individuals or committee members assigned to the task.

- Develop written procedures and programs. Certain processes will require written safety procedures in addition to the written health and safety program plan. Examples include emergency planning, respiratory protection, vehicle safety, and hazard reporting.
- Develop emergency response plans and procedures. For assistance in preparing plans to deal with chemical spills, see **Appendix D: Emergency Procedures in Public Secondary Schools in the Event of a Chemical Spill.**

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- Provide regular equipment maintenance, repair, and replacement. This goes for hazardous machinery, safety gear, and the ventilation system. Check that machine guards are in place. Implement a maintenance and repair record keeping system as well.
- Perform routine housekeeping. Get rid of rubbish by disposing of it properly. Check that items are properly stored and that exits are not blocked.
- Install engineering controls. The best way to make a process safe for people and the environment is by designing it that way. It is more reliable than having workers and students follow certain rules, wear protective gear, or clean up excess pollution. Committees are a great way to brainstorm ideas for engineering controls or substitute processes. It may also be helpful to get advice from outside experts (see **Appendix A: Resources.**)
- Provide personal protective equipment. This should be a temporary or last resort solution. Using protective gear involves careful selection, maintenance and user training.
- Install eye wash facilities and showers. Install eye washes and/or showers at battery changing stations, maintenance operations, heating and ventilating operations, and other processes that use or could emit corrosive chemicals.
- Work cooperatively with inspectors from regulating agencies. Remember that the purpose of regulations is to ensure that employers maintain a safe and healthy work environment. Inspectors often can help you identify ways to abate hazards found during an inspection (see **Appendix C: Tips for Making an Inspection a Cooperative Rather Than an Adversarial Experience.**)
- Get expert advice. Difficult problems often are handled best by having a committee of all involved parties brainstorm solutions. There are times, however, when you may need some outside advice. NJDOE, the County Superintendent's office, PEOSH, NJDHSS, NJDEP, NJDCA, EPA, OSHA, the local fire department, or your local branch of the American Industrial Hygiene Association or National Safety Council are some of the sources that can give you free advice or a referral to an appropriate consultant or organization. See **Appendix A: Resources** for addresses and phone numbers of these organizations.

Train Employees and Management

- Train all new employees and students. N.J.A.C. 6A:19-6.5 requires that new employees and students must be made aware of all the known hazards of the materials and equipment with which they will work before starting a vocational-technical program or course. This can be built into basic orientation and the curriculum.
- Provide mandated training programs to employees and students. Depending on the types of classes you have, training may be required on: emergency and fire prevention, fire extinguishers, respiratory protection, occupational noise exposure, woodworking machinery, welding, asbestos handling, Right to Know, and hazardous waste handling. Training is also recommended for video display terminal operators. Direct supervisors should receive the same training as their students or subordinates.
- Train safety representatives and Hazard Prevention Committees. Training can enhance their ability to carry out the functions listed above. In particular, they may wish to obtain training in how to computerize the program, accident investigation, safety and environmental recordkeeping, hazard identification and control, industrial hygiene fundamentals, or environmental regulations. Outside training opportunities provide an essential means for safety, health and environmental personnel to network with and learn from programs in other schools. Do not forget to budget for this.
- Obtain training help from the regulating agencies. The PEOSH Program in the NJ New Jersey Department of Labor and Workforce Development and the NJ Department of Health and Senior Services conduct free training. In addition, OSHA will also go into schools and provide free training. Other regulating agencies often provide free training or informational sessions as well. If not, they can steer you to an appropriate training organization. The Safe Schools program offers free training on occupational safety and health topics throughout the year.

Do not feel overwhelmed if you currently have only small parts of an environmental, health and safety program in place. It takes time, money, and a lot of persistence on the part of concerned individuals to have a good program. The impetus may come from a combination of citations, employee complaints, accidents or management or union interest. Whatever the reason, as you begin each new step, feel confident that you are already making a big difference compared to the way things were run before.