

# NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES, INC.

Commission on Independent Schools

## Health and Safety Considerations

### 2020 Edition

The Standards of the NEASC Commission on Independent Schools recognize the importance of regulatory understanding and compliance and, also, of culture and climate when creating a healthy and safe school. School personnel need to have appropriate knowledge of laws and regulations, to follow safety protocols and to recognize that a safe school is as much about perceiving and anticipating risk as about law and compliance.

Accredited schools:

- Build a school culture and climate devoted to health and safety in every program and activity
- Help students learn to care appropriately for themselves and for others
- Nurture students' growing maturity and independence, appropriately supervising and supporting them according to age and development
- Provide all adults who care for, teach, work with or are around students the necessary knowledge, training and skills to keep students safe
- Insure these adults possess the character, education, background and experience required to work safely with students and in the community

“Safety” is not a single static state; it is a capacity. A “safe school” is an approach and a practice. Schools must practice the ability to assess risk and make sensible choices. They must practice the perception of danger and possible alternatives, and additionally they must practice acting swiftly in some circumstances and behaving with restraint in others. “Safety,” to paraphrase Reinhold Niebuhr, “is the wisdom to know what needs to be changed.”

In a safe school community, adults care for children and young people, protecting them from foreseeable risk and appropriately nurturing their growing independence. A safe school helps students understand and respect potential dangers and, when appropriate, helps them take responsibility for themselves and others. Safety and health are approaches to life's realities seen through the lens of experience and perspective young people often do not possess but will gain over time. Health and safety are often a matter of anticipation and prevention.

The “Considerations” listed here are intended to help schools identify, anticipate and address a variety of potential issues. The extent of the list underscores the complexity of establishing a healthy and safe environment. These “Considerations,” drawn in part from insurance companies' and other school associations' guidelines and check-lists, reflect the experience of NEASC Accredited schools. However, as substantial as this listing appears to be, it cannot address the full range of school activities and safety concerns facing each school and it cannot encompass certain aspects that may be unique to a school. The distinctive reality of many schools will call for the inclusion of many considerations not listed and may render some inapplicable.

Schools run playgrounds with slides and swings and monkey bars and programs like dodge ball and tag and frisbee. School sports include football, lacrosse, field hockey, soccer, basketball, ice hockey, baseball, volleyball, track and field – including hurling javelins and shot-puts - and competitive archery. Schools operate rowing programs, swim teams, competitive and recreational sailing programs, kayaking and windsurfing, fencing, gymnastics, cheer-leading, cross country running and rock-climbing. Schools take students on tall-ships and winter camping trips, offer downhill ski racing, ski-jumping, Nordic skiing with courses many miles from campus and figure skating, water polo, synchronized swimming, competitive diving and scuba-diving. School groups and individuals travel to Europe, Central and South America, Africa, Asia and the Caribbean. Students in independent schools learn to ride and jump horses, operate chain saws, drill presses, table saws and acetylene torches. They install lighting for drama productions, make movies and mix chemicals in labs and dark rooms. Students carve wood and marble, place and remove their ceramic pieces from kilns and paint with oils and acrylics.

And, as they mature, they learn to drive, begin to date and negotiate their own sexuality and that of those around them. Students may have been approached by drug dealers or persons encouraging drug use. Some students never know deprivation, and some come to school hungry or return to an empty house. Usually the people they live with are loving and involved (or over-involved) and sometimes they prove difficult, or worse, abusive. Sometimes there's a bigger kid or a mean kid or a strange adult influencing their lives. Sometimes students' friends turn on them and sometimes their friends need a variety of support they have no idea how to provide.

Each of these realities, programs and activities present distinct challenges and their own unique universe of potential health and safety issues. The nearly unfathomable variety of situations lies at the heart of the NEASC emphasis on culture and climate. While no single individual could know or enforce every safety consideration in every school activity and no listing could encompass all potential risks, if all individuals know that health and safety is their first priority then the program of the school properly aims toward safety. Van Gogh (not known as an expert on safety) once wrote "If one is master of one thing and understands one thing well, one has at the same time insight into and understanding of many things." In schools, the culture and climate of safety is the "one thing" to know well.

Considering all the items here – and the hundreds more embedded in school programs – does not and cannot guarantee that a school has a plan or approach to resolving every possible contingency in each category. "A safe school" recognizes risks and helps adults and children confront and manage them appropriately. A safe school considers "safety" a goal for which it always strives.

There is no substitute for legal or other expert counsel. NEASC does not provide legal advice to schools and does not consider the list below a substitute for professional counsel.

**No list of Health and Safety Considerations can be complete or adequately anticipate every circumstance. This is a list of some potential school safety issues. NEASC recommends that schools use this list as a springboard to regular discussion, reflection and planning. A school's planning might address every item on this list and still encounter entirely novel events. Appropriately and consistently considering these items and the many others**

**embedded in the variety of school programs is good practice. Such planning and discussion, however thorough, cannot guarantee absolute safety and security, the avoidance of all risk or death. But a school devoted to creating a safe climate and culture can create an environment mitigating risks to safety.**

## **NOTES ON COVID-19 AND PANDEMICS OF THE FUTURE**

NEASC's "Health and Safety Considerations" 2017 Edition included not a single word about Coronaviruses nor the disruptions and planning stemming from a world-wide pandemic. A few with vision and imagination had been predicting such events for many years [e.g. Bill Gates's 2015 TED talk on the subject] but all schools will now be creating a Pandemic Plan as an essential component of both their Crisis Management and Strategic Plans. It does seem unfortunately likely, now, that some version of this experience may be replicated.

As of the August 2020 Edition, despite a great deal of attention over the last several months, NEASC does not possess sufficient information nor experience with operating school programs to articulate universally viable approaches.

At present, a great deal – including both how to treat and prevent this disease – remains unknown. It is perhaps of some value to remind ourselves that approaching "the unknown" is what schools are for. While none of us will get this situation exactly right, what we can do is remember how we expect our students to approach the unknown. "Grace under pressure" remains a useful touchstone as are scholarship, facts and, in the midst of it, dignity and sense of humor.

As of August 2020, NEASC suggests that all Pandemic Plans addressing Covid-19 should include the following:

- Clarifying the goals of the school's plan with the understanding that no plan resolves all issues. If a school opens during this pandemic, that creates risks of virus transmission; if a school closes, sending young people and employees into other environments, the risks may still be present. Currently, thoughtful schools are preparing three different plans for: physical reopening, hybrid and fully online education. We are, as this is written, in a tentative space.
- Understanding that this virus is transmitted by humans primarily through the air, indicating that all measures to inhibit this transmission, particularly wearing approved masks and practicing social distancing, will be helpful;
- Recognizing that physical transmission is also possible so requiring careful hand washing [20 seconds of scrubbing is recommended] and thorough surface cleaning – doors, desks, bathrooms, locker rooms, hallways, etc. - will be beneficial;
- Encouraging frequent testing will better enable a school to recognize and then isolate infected individuals – understanding that asymptomatic people are fully capable of transmitting virus;

- Developing extensive and thoughtful provisions for online education, including training for faculty, creating a library of online resources and ensuring that all faculty and staff have the technological resources to work remotely whenever possible;
- Emphasizing the singular importance of communication with all constituencies and the effective use of multiple perspectives;
- Ensuring that teachers create and maintain strong personal relationships with students and families;
- Creating detailed plans for physical plant renovations/changes necessary to accomplish the above;
- Understanding the emotionally conflicted reactions of all parties to whatever plan is created
- Referring to NEASC Resources for examples of detailed and thorough plans

### **Physical and Emotional Safety of Students**

1. Immunization records are up-to-date and in compliance with state requirements/codes.  
 Note: As of 2017, of the six New England states, only Maine still offers a “philosophical exemption” from certain vaccination requirements; the other five states (and Maine) all offer certain religious and medical exemptions. Schools should consult relevant statutes in their state.
2. The school uses a formal medical release (Child Medical Consent to Treat) form. Parents use a “consent to treat” or “medical release” form to authorize providing medical treatment to their child if an emergency occurs and parents or guardians cannot be reached. These forms should be on file for each student. These forms may also provide authorization to treat or address food or medication allergies and other health issues (such as diabetes, epilepsy, bee-sting reactions, fears or other psychological conditions).
3. The school has attendance policies for students with potentially communicable diseases and distinguishes (if relevant) between boarding and day students.  
 It can be helpful for schools to publish attendance policies for such conditions as scabies, lice, flu and other communicable childhood illnesses or conditions. Published policies prior to the appearance of such conditions on campus clarify for parents and school personnel what the school will and will not permit.
4. The school has a written concussion assessment and management protocol.
5. The school provides sufficient counseling services and referrals to meet the needs of the students.
6. The school has anticipated its approaches to public/behavioral manifestations of mental health concerns. (For instance, acting out, outbursts, abusive or offensive language, threatening gestures, suicide gestures and attempts).  
 Note: There are many responsible approaches to student mental health. NEASC recommends that schools recognize the vital importance of mental health and include

appropriate services to meet both acute and chronic issues. Further, schools need also to recognize the limits of issues that can reasonably be addressed within their community. Some schools are reasonably prepared to deal with issues that would be outside the range of another school.

Regardless of their approach, however, schools must assess whether or not a physical or mental health condition presents a disability protected by various legal requirements and schools must review each situation individually where the law requires, considering the nature of the condition, the needs of the student, the appropriateness and availability of any accommodations and the extent of the health services available at the school.

While such situations may present case specific challenges, schools will likely maintain an expanding portfolio of protocols and possible responses that take into account academic, residential (if a boarding school) and related requirements and available resources. NEASC notes that the area of policy development around accommodating students with physical and mental health disabilities is nuanced and subject to legal requirements and seeking legal counsel is advisable.

Students' mental health and the ability of a school to offer appropriate support can be challenging and specific situations require judgment and experience.

7. The school has a policy and procedure for the administration and storage of medications.

Some schools, for instance, provide a place at mealtimes for a nurse or qualified healthcare provider to distribute certain medications. Schools need to be sure students understand where their medications will be reliably available. Schools should pay attention to arrival and departure days to be sure that all medications have been properly collected, identified by student and stored or locked as necessary. Schools should consult with parents or guardians about possible distribution of unused medication on departure days; in general, NEASC would recommend that medications in bulk not be accepted from or distributed directly to students when parents or guardians are not present. Delivery services can provide for international students.

8. The school has a policy for student possession of prescription and non-prescription medications.

It is important for schools to decide what – if any – medications, including both “over the counter” and prescription medications – students may have in their personal possession. Many schools require that all medications be kept under the control and supervision of appropriate designated school personnel on campus.

9. The school requires reasonable screening for student vision and hearing.
10. Where necessary, the school requires spinal screening.
11. The school has a policy for obtaining information on student allergies and procedures to respond to allergies in student areas such as classrooms, food service, athletics, dormitories and on field trips.

It is particularly important that school personnel (i.e. classroom teachers, activity supervisors and coaches) be aware of any potentially life-threatening allergies (peanuts or particular foods, bee stings, etc.) among the students with whom they are in contact.

12. The school has access to healthcare professionals adequate to meet the needs of the students.

Schools employ and/or may make referrals to a wide range of health professionals. NEASC recommends that schools make a thoughtful determination of the needs of their students including, where possible, their lives beyond the walls of the school.

13. For residential schools: the school has developed and properly distributed a *Residential/Boarding Handbook* for students (this is an example of such a title).

The *Handbook* should provide residential policies, rules and regulations around hygiene, hours, noise, fire & safety, personal relationships, study conditions, electronic technology, visitors, locked doors, theft, security etc., and the tone and culture of the residential setting. Many residential schools include this kind of information in their general *Student Handbook*. NEASC does not require a separate publication. However, it is essential that residential students, faculty and families understand the range of specific approaches, climate, culture and regulations applying to residential programs.

14. The school has policies about guests in buildings, deliveries to campus and procedures around student mail and packages that respect privacy without compromising the need for safety.

Who is and is not allowed into student housing or school buildings and the hours of such entrances should be clear. The exterior doors of dormitories and many school buildings are usually monitored by locks and/or on-site supervision. Schools should be clear about times and situations when students can exercise independent judgment about allowing visitors to enter and which visitors are allowed.

Schools should clarify for students if packages or deliveries to them will be inspected or monitored. Schools should have clear policies around food or package delivery to students. For example, students should expect that deliveries by mail or package service that include drug paraphernalia or substances will, when suspected or detected, be subject to inspection and appropriate action including referral to criminal authorities.

15. Schools with international students clearly recognize the emotional needs, cultural integration, language challenges, dietary needs, family and travel complexities accompanying their time in the States. The school designates an individual or office with specific responsibility for international students.

16. The school has clear policies around its direct responsibilities to international students in homestay programs and, specifically, does not rely solely on agencies to deal with homestays but does monitor, physically inspect and insure the proper housing, diet, cultural integration and family communication on behalf of its international students.

Note: Many accredited schools enroll international students. These students come seeking an American education and experience and bring much to enrich their schools. It may be noted that their personal needs fall along a very broad spectrum. That being said, it is not unusual for international students to be stoic and schools should be sure to reach out personally and frequently to these young people to assess their current state physically and emotionally. International students also bring cultural realities around, for instance, gender, academic expectations, diet, dress and religion that require understanding, respect and insight to integrate safely into the school. The international student faculty coordinator/leader/director plays an essential and often complex role within the school as all parties learn to navigate differences in healthy ways.

17. The school appropriately considers the parameters of confidentiality in all public discussions.

Schools are privy to a great deal of personal and sensitive information and all school personnel need to be conscious of the importance of respecting confidentiality. Students should be advised that if they choose to share sensitive personal information with appropriate school personnel, any statements that could reasonably be interpreted as implying harm to themselves or others will be shared as necessary and will not be kept confidential. Trust in schools is largely dependent on the appropriate preservation of confidentiality and schools should include training for both faculty and students around the exercise of appropriate confidentiality.

### **Information and Data Management**

1. Medical records' retention and access policies meet applicable state and federal requirements.

The retention and access requirements for elementary and secondary independent school medical records are quite complex. NEASC recommends that schools receive legal counsel about their situation. Retention rules may require schools to keep some records until students reach 18 or until the required state time-requirement has been met, whichever is later. Rules around medical record retention vary by state; Vermont requires ten years with the other five New England states each requiring seven. Schools should note that these laws are subject to change and particular situations may give rise to the need to extend the retention period. FERPA rules do not generally apply to independent schools if they do not receive specified federal funds. HIPPA rules may apply in specific situations; again, legal counsel is advised. Once schools have clarified the requirements for retaining – and disposing – medical records, it would be important to monitor compliance and to complete, at regular intervals (minimally every 24 months) a written report detailing work completed.

- 2 The school has protocols for access to and thoughtful storage of immigration records (i.e. student passports, I-20s, etc.).

Some schools elect to keep passports and I - 20s in a secured area or safe to ensure that students have proper documentation when they travel. It has been noted that some international students are very meticulous about their documentation and some less so. It has also been noted that, at times, passports have been reported stolen or missing. Offering to help students keep track of these highly important documents may be helpful. The school's policies around this documentation should be clear to students and to parents.

3. The school has a policy for records retention (i.e. timetables and provisions for record removal and destruction) and safe, secure, fire-proof storage and should confer with its legal counsel about requirements that affect records retention.
4. The school has a data security policy addressing the protection of and access to Personally Identifiable Information (PII) and Personal Health Information (PHI) including both physical and electronic records and should confer with legal counsel about requirements affecting records retention.

### **Student Behaviors and Discipline**

1. The school has policies and expectations for student behaviors.

School policies and expectations around student behaviors are deeply embedded in the school's culture. The Guidelines cannot articulate all areas of expectation nor the many nuances of a school's approach to disciplinary situations. These approaches should be true to the mission of the school. Some schools deal with many behaviors through various combinations of conversation, counseling and instruction; this is particularly true with elementary and middle schools but may be the approach at the secondary level as well. Some schools have various disciplinary requirements up to and including expulsion. The Guidelines in this section ask schools to be sure their approaches are well-articulated and promulgated to the community.

2. The school has policies around student drug or alcohol use or other potentially harmful substances (i.e. Vaping, Tylenol dosage, energy drinks, chewing tobacco, glue sniffing, etc.)
3. The school has policies, procedures and training around harassment, bullying (including cyber-bullying) hazing, sexual misconduct and sexual assault and related behaviors.
4. As appropriate by age of students, the school has policies articulating concepts of sexual consent and healthy relationships.

Note: The simple sentences in #3 and #4 above merit significant discussion, reflection and training for adults and students. The International Task Force on Child Protection "Final Report and Recommendations" and the NAIS "Independent School Task Force on Educator Sexual Misconduct" both address a broad range of considerations in these areas.

Again, while no document will address all possible issues, these two provide useful reference.

5. The school has policies and approaches to student-to-student conflict resolution.
6. The school has clear “acceptable use” policies around technology and social media.
7. The school’s disciplinary procedures and outcomes are clear.
8. The school appropriately communicates disciplinary situations.

The school understands and balances the range of appropriate public communication from “confidential” on one end to “broadly disseminated” on the other and has policies for communicating disciplinary decisions to students and families that keep student safety in the forefront. The school understands, for example, that students in the midst of disciplinary procedures may be in a heightened and more vulnerable emotional state.

The intention of this consideration is to underscore the care needed when disciplinary decisions are communicated. Specifically, for instance, students being separated from school should not generally be informed of this decision unless the school has a provision for direct and constant supervision. Schools should, in another example, be aware that social media provides an avenue for disseminating disciplinary decisions with instantaneous implications. Schools should consider carefully “who needs to know” and “under what circumstances” decisions are communicated and by whom. If schools embrace student disciplinary committees, these groups have a particularly challenging responsibility in the electronic age. Schools have significant responsibilities stemming from multiple sources for communicating discipline situations sensitively and appropriately. Schools should consult with their own legal counsel and other professional advisors regarding these protocols.

9. A residential school has reasonable access or referrals to 24/7 medical advice and care.

Most schools have access to 911 services. It would be worthwhile to consider a range of potential health or safety issues where 911 may not be the best option. For example, it is helpful to anticipate that some physical and mental health issues may arise “after hours” and to have worked out in advance whom the school might contact in these circumstances.

### **Faculty and Staff Health Training, Policies and Procedures**

1. The school community creates and provides a written set of faculty/staff expectations. This document could take the form of a “*Code of Conduct*” or “*Staff Handbook*” but it should articulate interactions with students, colleagues and other members of the community that are in keeping with the school’s fundamental values and, also, with state or other legal and ethical requirements. Such a document should be reviewed annually and might include the following:
  - Statements of the fundamental values and/or ethical principles of the school

- A statement of the intent of the *Faculty/Staff Code of Conduct*
- A statement of the school’s responsibilities toward faculty and staff
- A thoughtful approach to the reasonable range of faculty/staff behaviors/interactions
- Specific policies and procedures around sexual harassment
- Specific policies and procedures around child abuse and neglect
- A clear description of state-mandated reporting requirements and procedures
- Standards for professional conduct by faculty that also include clear examples of types of unacceptable behaviors
- Disciplinary procedures and sanctions

A written “*Faculty Code of Conduct*” might be included in a school’s “Faculty Handbook” or it might be a stand-alone document. Its intent is to help faculty understand the importance of their behaviors in the context of the mission and life of the school community. The Considerations here don’t anticipate a moralistic or prescriptive tone nor is it intended to limit the joys of school life. Understanding the expectations of professional conduct and the legal and moral implications of the work adults carry out with young people is essential to a healthy community. Such a “Code” should not imply a heavy-handed enforcement but rather thoughtful agreement about the foundations of a dependable and productive school community. A school without such a document might consider forming a faculty committee to create it.

2. The school provides and requires periodic training for all adults who interact with students on the requirements of state-mandated reporting, blood-borne pathogens, CPR and basic first aid.

Schools adopt different training requirements depending on their own realities. All adults in contact with students should be required to understand mandated reporting requirements. NEASC recommends that All school employees (and adult family members in a residential school) in contact with students undergo reasonable training for health emergencies. Predicting who might or might not be physically present in the event of an emergency is more difficult than assuring all adults have basic skills.

3. The school has protocols for screening/background checks for any adults who have contact with children.

This should be required for all faculty and staff prior to hiring (or completed retroactively for current faculty) and is highly recommended for all adult members of the community. The formal background check is simply a reality of modern life. While such investigations cannot insure the responsibility of every faculty member, they are a requirement of responsible hiring practice. NEASC regards formal background checks and personal reference checking as fundamental to an accredited school’s personnel and hiring procedures.

4. The school has a policy on faculty transportation of students in school and/or personal vehicles. School personnel should be clear about who may ride with them and under what

circumstances and be particularly aware of the risks of adults and students alone in cars. The school should keep a record of the vehicles owned or leased by the school. The school should have on file individual faculty driver training record as necessary (for faculty who may be driving school buses for instance), periodic driver record checks and insurance requirements.

Through their own insurer, schools need to clarify if “school insurance” or “personal insurance” is in effect should a faculty member drive a student in his or her private vehicle. The school should articulate circumstances when such transportation might be acceptable or even desirable and when such a trip would be inadvisable. The School has a policy addressing when a faculty member or other adult in the community may or may not be alone with a student(s) in a vehicle. The school’s insurance advisor should address these issues as unambiguously as possible.

5. The school has policies and procedures around adult supervision of field trips or off-campus events and clarity about appropriate adult/student ratios on such ventures.
6. The school has policies and procedures around supervision of after-school programs, including athletics, the arts, tutoring and specialized programs.
7. The school has a thorough *Faculty/Staff or Employee Handbook* covering all aspects of employment, duties & expectations, vacations, benefits, housing policies (where appropriate), etc.

As mentioned in #1 above, a school can surely combine this *Handbook* with a *Code of Conduct*.

### **Communication**

1. The school has an *Emergency Contact Plan* containing necessary information for all members of the community (faculty, administration, student-family, fire, police, EMT) and readily available to designated school personnel. This Plan details whom to call under what circumstances (student injury or accident, fire, intruder, plant emergency, bus break-down, off-campus situation).

Note: The provision for “readily available” means that multiple copies of phone numbers, email information, emergency contact information, etc. should be broadly enough distributed in the school that an adult or student could physically put their hands on it when necessary.

2. Recognizing that technology defines “shifting sands,” the school strives for a robust cyber-security program to protect communication, records, sensitive information and, most importantly, students, faculty and staff.

Given the apparently bottomless capacity for activity ranging from cyber-mischief to criminal theft, the school should take all reasonable precautions to keep its networks secure from malware, worms, hacking, ransomware, etc.

3. The school has parent/guardian permission/release procedures/forms for student contact with media, publication of pictures and student information, etc.
4. The school has a *Parent/Student/Family Handbook(s)*.

Such *Handbooks* should detail the school's responsibilities toward their students' families and articulate the school's expectations around all aspects of family/student/school relationships including such items as acceptable clothing, activity permission policies, illness, transportation permissions, vacation days, parent requests for student absences, technology expectations for in-school use of phones, social media sites, clarity around school provided computers or various grading/homework/communications websites.

5. The school has a policy around written recommendations for faculty.

This policy should make the distinction between a recommendation "from the school"—written on school letterhead and approved by school leadership – and one that is a "personal recommendation" written by a friend or colleague (which should never appear on school letterhead). The former should be "the school's position" and the latter is a personal opinion.

Providing recommendations for departing employees is both an important and, sometimes, a complex undertaking. At times, a departing school employee may not wish the Head of School or other member of the school's administration to write or speak on his or her behalf. At other times, a member of the administration may inform an employee that they may not provide a positive reference. The intention of this consideration is to help a school anticipate these kinds of challenging situations. Fair, honest and straight-forward recommendations are crucial both to further employment and to the life of both a former and future employer/school. It is particularly important that personal recommendations never be promulgated as "the school's." In their hiring procedures, it is imperative that schools understand the sources of a prospective employee's recommendations.

### **Facilities**

1. The school completes an appropriate safety and security review of all facilities, grounds and equipment.

A formal facilities review, often done in concert with the school's insurers, will be completed on a mutually determined schedule. At regular intervals, the school should take a close look at all its facilities, attending to safety issues – overhanging limbs, broken stakes, worn exercise equipment, leaks, inadequate or missing signage, faulty lighting, icy patches, etc. Checking the physical campus for "issues" should be part of a school's culture and making sure such issues are reported responsibly (i.e. through a regular inquiry among faculty and staff) should be part of everybody's "job description." "That's the job of maintenance" is an unacceptable approach to reporting physical safety issues. The school should have a dependable system for addressing safety/security issues.

2. In its facilities review, the school pays attention to the capacity of all facilities to be supervised appropriately; spaces should be well lit as necessary and accessible as required.
3. The school creates an appropriate approach to risk management when a physical project occurs on campus. When a school undertakes construction, road repairs, plant renovation or improvement, for example, informed individuals should analyze foreseeable risks and take appropriate preventive measures (properly places signs, fences, lights, public announcements, cones, sawhorses, etc.)

The intent of these Considerations is to remind schools about the importance of managing risks attendant to construction, repair work, general maintenance – i.e. painting, masonry, plumbing, road work, window glazing, etc. - that requires equipment, trucks, scaffolding, secure sites and changed pathways or safety zones. Sometimes these types of equipment or conditions “attract” the attention of students or others leading to unauthorized and unintended access. Anticipating and preventing unauthorized and unintended access is important.

4. The school has policies and procedures for third-party contractors providing physical services on campus (i.e. food service, janitorial services, lawn/landscape and building and utility maintenance). The school might, for instance, require contractors to provide their own back-ground checks on employees on campus. Such procedures might include a site check-in with an appropriate school employee, a posted schedule of work, a school-identification badge for every outside contractor, school-wide announcements about work schedules, etc. Such procedures may be affected by laws and the school should consult legal counsel.
5. The school conducts regular drills for fire, lock-down, intruder on campus – including bears, severe weather, bomb threats, campus/building evacuation and emergency relocation.
6. The campus is physically capable of being appropriately locked.
7. The school conducts regular/required inspections of the following:
  - Fire and emergency (i.e. carbon monoxide) alarm systems
  - Sprinklers and fire extinguishers – noting, particularly residential facilities
  - Smoke detectors
  - HVAC systems
  - Major electrical connections (interior and exterior)
  - Playground equipment
  - All athletic equipment (i.e. football tackling dummies, wrestling mats, nets, flooring, etc.)
  - Swimming pool, water safety equipment and pool access
  - Elevators
  - Water quality

- All school vehicles
  - Seat belts and other vehicle safety equipment (i.e. fire extinguishers, first aid kits where appropriate, spare tires, flares, road-side contact information in each vehicle)
  - Asbestos sites, (responding to Asbestos Hazard Emergency Response Act)
  - Lead paint remediation as required
  - Radon levels
  - Pest control
  - Handicap parking requirements
  - Public street access
  - Campus signage – which should be clear where necessary for first-time visitors
  - Campus lighting
  - Trees, shrubbery, and clearing views where necessary (i.e. foliage blocking clear views of roads and pedestrian crossing zones)
8. The school establishes clear parking and traffic patterns, carpool guidelines, drop-off and pick-up protocols, parking for major campus events.
  9. The school establishes lab and classroom safety protocols including policies on storage and use of chemicals, cleaning products, caustic/flammable substances in labs and art classrooms.
  10. The school has policies to protect the safety of janitorial and cleaning staff and to safeguard the products used.
  11. All school facilities are clean, sanitary and hygienic with specific cleaning and maintenance procedures.
  12. Food service meets applicable local and state requirements and guidelines.
  13. When a school has a pre-school program for children three and under, that program meets applicable state mandates and requirements and proper certification is provided.  
  
NEASC reiterates that the Commission on Independent Schools does not accredit programs for this age group and notes that these programs are subject to often-rigorous state requirements.
  14. The school has individuals/committees specifically designated to take direct responsibility for on-campus safety.  
  
Note: NEASC recommends that all schools create a “Safety Committee” whose responsibility is regular review and thoughtful and clear response to the culture and climate, and specific health and safety concerns. This Committee should have adequate representation from all constituencies and might also include students and parents where appropriate.
  15. The school has a Crisis Management/Response Team that is informed and conducts drills as appropriate.

A school may use its normal administrative or decision-making team for this work. It is important for the school to clarify who would expect to be part of the Management/Response Team and to decide, in advance of a crisis, the responsibilities of individual members. A school doesn't want to be putting together this group "on the fly" should untoward circumstances arise.

16. The school clearly maintains all emergency ingress/egress passageways in dormitories, classrooms, all public spaces, hallways and stairways.
17. The school has specific regulations for the presence of firearms, fireworks or explosive devices, knives, slingshots, blowguns, bows and arrows and any other equipment or devices whose misuse might clearly cause harm.
18. The school maintains a Safety Incident Log that records any significant breaches or incidents of security break-down.
19. The school has a policy of parent notification in the event of a security incident.
20. The school has policies around the many issues arising from third-party use of the campus.  
  
These should include proper insurance provisions, liability waivers, hold-harmless provisions and communication plans for those on-campus who might be affected by third-party users.
21. The school plans for any groups – athletic teams, performance or parent-event attendance, alumni gatherings, etc. – who use the campus at irregular times.
22. The school plans for all summer program or events on campus and for any other events (i.e. athletic tournaments, seminars, lectures or concerts, etc.) occurring when the campus is "normally closed." The school should consult their legal counsel and insurance carrier around any special situations or requirements that apply to its summer programs and activities.
23. The school plans for any use of other non-school-owned facilities (rinks, gymnasiums, libraries, trails, parks, etc.) that are not part of the school's own campus.
24. If the school has programs that regularly take place off-campus (camping and hiking trips, service learning projects, international travel, international exchange programs, class trips, etc. ) the school has carefully worked through the many details of such ventures and has clearly communicated the advantages and potential risks of such programs to faculty, students, families and other individuals (i.e. homestay families, faculty in a host school, park rangers, guides and program directors) with an obvious need to know.
25. Schools in proximity to any body of water – swimming pools, rivers, pond, lake or ocean – have appropriate safety protocols, signage, training and necessary safety equipment, rescue facilities and communication procedures.

## The Crisis Response Plan

To meet NEASC Foundation Standard 5 the school must have a thorough *Crisis Response Plan*. It may incorporate other plans such as a communication plan, fire and evacuation plan, etc., that are referenced at other points in these Considerations. Each school's *Crisis Response Plan* will be tailored to its circumstances, location, staffing, age of children, facilities as well as local fire, law enforcement, EMT professionals, the availability of mental health coordinators and the media. The primary goal of a *Crisis Response Plan* is, above all, the safety and security of students, faculty, staff and all other human life. It should include programs for prevention, mitigation, preparation, response, recovery and, most importantly, communication. It will always be an evolving document; however thorough, common-sense and thoughtful a *Crisis Response Plan* a school puts into place, it can never anticipate all possible issues.

Some examples of issues that might be included in such a plan would be:

- Accident/injury
- Fire/smoke/explosion
- Bomb threats
- Death of a member of the community
- Child abuse
- Immediate and unexpected health emergency for students or adults
- Disturbances or threats in a neighborhood (a deranged individual; drunks, escaped convicts or individuals resisting arrest)
- Domestic abuse
- Outbreak of communicable disease or health compromise (ranging from lice to bed bugs to influenza.)
- Lost/missing child
- Wild/diseased animals
- Dead animals (i.e. a squirrel or other rodent found dead)
- Severe weather/power outages
- Weather delays/snow days
- Structural or utility failure
- Significant leaks/broken pipes
- Traffic accidents – on and off campus
- Faculty chaperone found under the influence of alcohol
- Irresponsible parent behaviors
- Local demonstrations or civil unrest
- Unwanted presence of media or press on campus
- Arrest on campus
- Intruders
- Unruly students (either a school's own students or others outside the community) before, after or during an athletic event, dance or on-campus event
- Theft by students – or faculty
- Student under the influence of drugs or alcohol

The *Crisis Response Plan* should be submitted to local authorities as necessary including police, fire and EMT offices. NEASC does not expect that these offices will “authorize” or “approve” a *Crisis Response Plan* (most are reluctant to do so) but should acknowledge they have received it. It is advisable that emergency services be consulted in the construction and on-going evolution of the *Plan*.

A useable *Crisis Response Plan* will address a range of concerns with a strong emphasis on thoughtful and pointed discussion, a clear chain of command and communication and the anticipation that, by definition, a genuine crisis will have distinctive features. Addressing all crises requires good judgment, rapid and thoughtful decisions and a dedication to rational and reasonable action. A school’s approach to campus crisis – from a sudden resignation or the death of a beloved faculty member or student to a severe student injury to a catastrophic equipment failure at exactly the wrong moment – will surely test its culture and approach to life’s uncertainties. A practiced and effective culture and climate are the surest bulwark against danger.

*Revised August 2020*