



NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES

Commission on Independent Schools Health and Safety Considerations

Without Annotation

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.

Summary of Considerations

Physical and Emotional Safety of Students

1. Immunization records are up-to-date and in compliance with state requirements/codes.
2. The school uses a formal medical release {Child Medical Consent to Treat} form.
3. The school has attendance policies for students with potentially communicable diseases and distinguishes [if relevant] between boarding and day students.
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].
7. The school has a policy and procedure for the administration and storage of medications.
8. The school has a policy for student possession of prescription and non-prescription medications.
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.
12. The school has access to healthcare professionals adequate to meet the needs of the students.
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].
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.
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 inspects and ensures the proper housing, diet, cultural integration and family communication on behalf of its international students.
17. The school appropriately considers the parameters of confidentiality in all public discussions.

Information and Data Management

1. Medical records' retention and access policies meet applicable state and federal requirements.
2. The school has protocols for access to and thoughtful storage of immigration records [i.e. student passports, I-20s, etc.].
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.
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.
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.
9. A residential school has reasonable access or referrals to 24/7 medical advice and care.

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

Communications

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

Facilities

1. The school completes an appropriate safety and security review of all facilities, grounds and equipment.
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.
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].
5. The school conducts regular drills for fire, lock-down, intruder on campus, 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 [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.
 14. The school has individuals/committees specifically designated to take direct responsibility for on-campus safety.
 15. The school has a Crisis Management/Response Team that is informed and conducts drills as appropriate.
 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, including 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.

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.

Resources: [International Task Force on Child Protection “Final Report and Recommendations” \(pdf\)](#) and the [NAIS “Independent School Task Force on Educator Sexual Misconduct”](#).