

LIBERTY ELEMENTARY SCHOOL DISTRICT
DISTRICT-WIDE SCHOOL SAFETY and HEALTH PROGRAM
&
EMPLOYEE RESOURCE MANUAL

INTRODUCTION:

In response to, and in compliance with, Montana Department of Labor and Industry Employment Relations Division Guidelines as provided for under the department's "Compliance Emphasis Program" (2016) which are reflected in the terms and conditions of the Montana Safety Culture Act (MSCA) as originally adopted into law in 1993, the Liberty Elementary School District Board of Trustees have adopted, by resolution, the following DISTRICT-WIDE SCHOOL SAFETY and HEALTH PLAN & EMPLOYEE RESOURCE MANUAL. All district-wide schools and personnel should consult the information and materials contained in this plan and manual for guidance on matters related specifically to safety and health in the workplace. As part of the planning process, the District has completed a Montana Safety Culture Act Evaluation in order to insure compliance with the major elements of MSCA including but not limited to MCA 39-71-1505(1)(a)(ii) and MCA 39-71-1505(1)(b).

PURPOSE:

The main goal of the Liberty Elementary School District's safety and health program is to prevent workplace injuries, illnesses, and deaths, as well as the suffering and financial hardship these events can cause for employees, their families, and employers. The recommended practices use a proactive approach to managing workplace safety and health. Traditional approaches are often reactive, that is, problems are addressed only after an employee is injured or becomes sick, a new standard or regulation is published, or an outside inspection finds a problem that must be fixed. These recommended practices recognize that finding

and fixing hazards before they cause injury or illness is a far more effective approach.

The Liberty Elementary School District Board of Trustees is committed to the belief that by implementing these recommended practices the district and its employees can work together to achieve the following goals and objectives:

- Prevention, and or reduction in the frequency and or severity of workplace injuries and illnesses, and
- Improvement with compliance and reporting - laws and regulations, and
- Reduction of costs, including significant reductions in workers' compensation claims, and
- Engaging employees to take responsibility for their continued safety and wellness while in the workplace, and
- Increasing productivity of the District while enhancing overall business operations by reducing the occurrence of injuries and illnesses.

Note: Preparation of the following LIBERTY ELEMENTARY SCHOOL DISTRICT, DISTRICT-WIDE SCHOOL SAFETY and HEALTH PLAN & EMPLOYEE RESOURCE MANUAL has included alignment with, and has been directly informed by, the Occupational Safety and Health Administration (OSHA) Recommended Practices for Safety and Health Programs.

Construction and Management of the Built Environment (school-wide):

The Liberty Elementary School District currently leases classroom space for all school-wide instructional programs from the four (4) Hutterite Colony Communities it serves. As these facilities are provided for under the arrangement of the lease by each of the aforementioned communities at the appropriate geographic locations, the District Board of Trustees, working cooperatively with each community, establishes operational standards and conditions to be maintained for each of the facilities.

In addition to providing the physical space in which classroom instruction and academic program support is delivered each day, the communities provide basic services in relation to the school building, including: access, ingress and egress, parking, utilities, equipment, maintenance and custodial support. Not unlike many rural school districts across the State of Montana, the classroom facilities

which provide instructional space for each of the District schools utilizes a dedicated, independent potable water service which is maintained, monitored and subjected to regular testing as part of the larger community wide effort to provide a clean, treated and filtered water supply for human consumption. The results of the regular water system tests are available for review from each of the host site administrators.

HAZARD IDENTIFICATION AND ASSESSMENT (MCA 39-71-1505(1)(b)):

Under the Montana Safety Culture Act, all Public Sector Employers (Public School Districts) are required to conduct a documented self-inspection or hazard assessment of each of their workplace facilities on an annual basis. One of the “root causes” of workplace injuries, illnesses, and incidents is the failure to identify or recognize hazards that are present, or that could have been anticipated. A critical element of any effective safety and health plan and related program is a proactive, ongoing process to identify and assess such hazards.

In accordance with MSCA the District will conduct an annual school-wide assessment intended to identify and assess the presence of hazards. Working with the Administration and staff, the District will routinely:

- Collect and review information about the hazards present or likely to be present in the workplace.
- Conduct initial and periodic workplace inspections of the workplace to identify new or recurring hazards.
- Investigate reported injuries, illnesses, incidents, and close calls/near misses to determine the underlying hazards, their causes, and safety and health program shortcomings.
- Group similar incidents and identify trends in injuries, illnesses, and hazards reported.
- Consider hazards associated with emergency or non-routine situations.
- For each hazard identified, determine the severity and likelihood of incidents that could result, and use this information to prioritize corrective actions. Some hazards, such as housekeeping and tripping hazards, can and should be fixed as they are found. Fixing hazards on the spot emphasizes the importance of safety and health and takes advantage of a safety leadership opportunity.

Action Item 1: Collect existing information about workplace hazards (school-wide)

Information on current workplace hazards may already be available to both the District Administration and employees from both either internal or third party external sources.

How the District will accomplish it:

- The District Administrative personnel will periodically collect, organize, and review information with employees school-wide to determine what types of hazards may be present and which employees may be potentially exposed to.
 - Information available in the workplace may include:
 - Self-inspection reports and inspection reports from insurance carriers, state or federal government agencies, and consultants.
 - Records of previous injuries and illnesses, including Workers' compensation records and reports.
 - Patterns of frequently occurring injuries and illnesses.
 - Input from District employees, including surveys or minutes from safety and health committee meetings (where available)
 - Information about hazards may be available from outside sources, such as:
 - OSHA, National Institute for Occupational Safety and Health (NIOSH), and Centers for Disease Control and Prevention (CDC) websites, publications, and alerts.
 - Montana Office of Public Instruction (OPI) data base
 - Labor unions, state and local occupational safety and health committees/coalitions ("COSH groups"), and worker advocacy groups.
 - Safety and health consultants.

Action Item 2: Inspect the workplace for safety hazards (school-wide)

Hazards can be introduced over time as workstations and processes change, equipment or tools become worn, maintenance is neglected, or housekeeping practices decline. Setting aside time to regularly inspect the workplace for hazards can help identify shortcomings so that they can be addressed before an incident occurs.

How the District will accomplish it:

- Administrative personnel will conduct regular inspections of all operations, equipment, work areas, and facilities. Have workers participate on the inspection team, and talk to them about hazards that they see or report.
- Document all inspections so the District Administration can later verify that hazardous conditions were corrected. Photos or video of problem areas will be taken to facilitate later discussion and brainstorming about how to control them, and for use as learning aids.
- All areas and activities will be included in these inspections, such as storage and warehousing, facility and equipment maintenance, purchasing and office functions, and the activities of on-site contractors, subcontractors, and temporary employees.
- Checklists will be used highlight things to look for. Typical hazards fall into several major categories, such as those listed below:
 - General housekeeping
 - Slip, trip, and fall hazards
 - Electrical hazards
 - Equipment operation
 - Equipment maintenance
 - Fire protection
 - Work organization and process flow (including staffing and scheduling)
 - Work practices
 - Workplace violence
 - Ergonomic problems
 - Lack of emergency procedures

Action Item 3: Identify potential health hazards (school-wide)

Identifying employees' potential exposure to health hazards is typically more complex than identifying physical safety hazards. For example, gases and vapors may be invisible, often have no odor, and may not have an immediately noticeable harmful health effect. Health hazards include chemical hazards (solvents, adhesives, paints, toxic dusts, etc.), physical hazards (noise, radiation,

heat, etc.), biological hazards (infectious diseases), and ergonomic risk factors (heavy lifting, repetitive motions, vibration).

How the District will accomplish it:

- Identification of possible chemical hazards— Administrative personnel will review SDSs and product labels to identify chemicals used in the District workplace that have low exposure limits, are highly volatile, or are used in large quantities or in unventilated spaces. Identification of possible activities that may result in skin exposure to chemicals will also be reviewed.
- Identification of possible physical hazards— Administrative personnel will identify any possible exposures to excessive noise (areas where you must raise your voice to be heard by others), elevated heat (indoor and outdoor), or sources of radiation (radioactive materials, X-rays, or radiofrequency radiation).
- Administrative personnel will identify possible biological hazards
- Administrative personnel will determine whether workers may be exposed to sources of infectious diseases, molds, toxic or poisonous plants, or animal materials (fur or scat) capable of causing allergic reactions or occupational asthma.
- Administrative personnel will identify ergonomic risk factors including the review of work activities that require heavy lifting, work above shoulder height, repetitive motions, or tasks with significant vibration.
- Administrative personnel will conduct quantitative exposure assessments, when possible, using air sampling or direct reading instruments.

Action Item 4: Conduct incident investigations (school-wide)

Workplace incidents—including injuries, illnesses, close calls/near misses, and reports of other concerns—provide a clear indication of where hazards exist. By thoroughly investigating incidents and reports, the District will, where evident, identify hazards that are likely to cause future harm.

How the District will accomplish it:

- Administrative personnel will develop a clear plan and procedure for conducting incident investigations, so that an investigation can begin immediately when an incident occurs. The plan should cover items such as:
 - Who will be involved — Lines of communication — Materials, equipment, and supplies needed — Reporting forms and templates
- Administrative personnel will train investigative teams on incident investigation techniques, emphasizing objectivity and open-mindedness throughout the investigation process.
- Administrative personnel will conduct investigations with a trained team that includes representatives of both the Administration and staff.
- Administrative personnel will investigate close calls/near misses.
- Administrative personnel will identify and analyze root causes to address underlying program shortcomings that allowed the incidents to happen.
- Administrative personnel will communicate the results of the investigation to Administration, and staff to prevent recurrence.

Action Item 5: Identify hazards associated with emergency situations (school-wide)

Emergencies present hazards that need to be recognized and understood. Non-routine or infrequent tasks, including startup/shutdown of daily activities, also present potential hazards. Plans and procedures need to be developed for responding appropriately and safely to hazards associated with foreseeable emergency scenarios and non-routine situations.

How the District will accomplish it:

- Administrative personnel will identify foreseeable emergency scenarios and non-routine tasks, taking into account the types of material and equipment in use and the location within the facility (school).
- Scenarios such as the following may be foreseeable:
 - Fires and explosions
 - Chemical releases
 - Hazardous material spills
 - Startups after planned or unplanned equipment shutdowns

- Non-routine tasks, such as infrequently performed seasonal activities (snow removal, ice, wind)
- Disease outbreaks
- Weather emergencies and natural disasters
- Medical emergencies
- Workplace violence

Action Item 6: Characterize the nature of identified hazards, identify interim control measures, and prioritize the hazards for control (school-wide)

The next step is to assess and understand the hazards identified and the types of incidents that could result from possible employee exposure to those hazards. This information can be used to develop interim controls and to prioritize hazards for permanent control (see “Hazard Prevention and Control”).

How the District will accomplish it:

- Administrative personnel will evaluate each hazard by considering the severity of potential outcomes, the likelihood that an event or exposure will occur, and the number of district employees who might be exposed.
- Administrative personnel will use interim control measures to protect employees until more permanent solutions can be implemented.
- Administrative personnel will prioritize the hazards so that those presenting the greatest risk are addressed first. Note, however, that employers have an ongoing obligation to control all serious recognized hazards and to protect all employees.

EDUCATION AND TRAINING

EDUCATION AND TRAINING are important tools for informing both Administrative personnel and employees about workplace hazards and controls so they can work more safely and be more productive. Another role of education and training, however, is to provide Administrative personnel and employees with a greater understanding of the safety and health program itself, so that they can contribute to its ongoing development and implementation.

EDUCATION AND TRAINING provides employers, and employees with:

- Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.
- Awareness and understanding of workplace hazards and how to identify, report, and control them.
- Specialized training, when their work involves unique hazards. Additional training may be needed depending on the roles assigned in the program. For example, Administrative personnel may need specific training to ensure that they can fulfill their roles in providing leadership, direction, and resources for the safety and health program. District employees assigned specific roles in the program (e.g., incident investigation team members) may need training to ensure their full participation in those functions. Effective training and education can be provided outside a formal classroom setting. Peer-to-peer training, on-the-job training, and worksite demonstrations can be effective in conveying safety concepts, ensuring understanding of hazards and their controls, and promoting best practices.

Action Item 1: Provide program awareness training (school-wide)

Managers, supervisors, and workers all need to understand the program's structure, plans, and procedures. Having this knowledge ensures that everyone can fully participate in developing, implementing, and improving the program.

How the District will accomplish it:

- Administrative personnel will provide training to all District employees including; certified staff, classified staff, substitutes and temporary employees on:
 - Safety and health policies, goals, and procedures
 - Functions of the safety and health program
 - Whom to contact with questions or concerns about the program (including contact information)
 - How to report hazards, injuries, illnesses, and close calls/near misses
 - What to do in an emergency
 - The employer's responsibilities under the program

- Administrative personnel will provide information on the safety and health hazards of the workplace and the controls for those hazards.
- Administrative personnel will ensure that training is provided in the language(s) and at a literacy level that all employees can understand.
- Administrative personnel will emphasize that the program can only work when everyone is involved and feels comfortable discussing concerns; making suggestions; and reporting injuries, incidents, and hazards.
- Administrative personnel will confirm, as part of the training that all employees have the right to report injuries, incidents, hazards, and concerns and to fully participate in the program without fear of retaliation.

Action Item 2: Train Trustees and Administrators on their roles in the program (school-wide)

District Trustees and Administrators are responsible for their employees' safety, yet sometimes have little training on safety-related concepts and techniques. They might benefit from specific training that allows them to fulfill their leadership roles in the program.

How the District will accomplish it:

- Reinforce Board of Trustees and Administrator's knowledge of their responsibilities under the Montana Safety Culture Act and the employees' rights guaranteed by the Act.
- Train Board of Trustees and Administrator's on procedures for responding to employees' reports of injuries, illnesses, and incidents, including ways to avoid discouraging reporting.
- Instruct Board of Trustees and Administrator's on fundamental concepts and techniques for recognizing hazards and methods of controlling them, including the hierarchy of controls (see "Hazard Prevention and Control").
- Instruct Board of Trustees and Administrator's on incident investigation techniques, including root cause analysis.

Action Item 3: Train employees on their specific roles in the safety and health program (school-wide)

Additional training may be needed to ensure that employees can incorporate any assigned safety and health responsibilities into their daily routines and activities.

How the District will accomplish it:

- Administrative personnel will instruct employees on how to report injuries, illnesses, incidents, and concerns. If a computerized reporting system is used, ensure that all employees have the basic computer skills and computer access sufficient to submit an effective report.
- Administrative personnel will instruct employees assigned specific roles within the safety and health program on how they should carry out those responsibilities, including:
 - Hazard recognition and controls (see Action item 4)
 - Participation in incident investigations
 - Program evaluation and improvement
- Administrative personnel will provide opportunities for employees to ask questions and provide feedback during and after the training.
- As the program evolves, Administrative personnel will institute a more formal process for determining the training needs of employees responsible for developing, implementing, and maintaining the program.

Action item 4: Train employees on hazard identification and controls (school-wide)

Providing employees with an understanding of hazard recognition and control, and actively involving them in the process, can help to eliminate hazards before an incident occurs.

How the District will accomplish it:

- Administrative personnel will train employees on techniques for identifying hazards, such as job hazard analysis (see OSHA Publication 3071).
- Administrative personnel will train employees so they understand and can recognize the hazards they may encounter in their own jobs, as well as more general work related hazards.
- Administrative personnel will instruct employees on concepts and techniques for controlling hazards, including the hierarchy of controls and its importance.
- Administrative personnel will train employees on the proper use of work practice and administrative controls

- Administrative personnel will train employees on when and how to wear required PPE.
- Administrative personnel will provide additional training, as necessary, when a change in facilities, equipment, processes, materials, or work organization could increase hazards, and whenever a worker is assigned a new task.

PROGRAM EVALUATION AND IMPROVEMENT

Once a safety and health program is established, it should be evaluated initially to verify that it is being implemented as intended. After initial implementation, the District will conduct periodic (annually), program assessments to determine with certainty what is working and what is not, and whether the program is on track to achieve its goals. Whenever these assessments identify opportunities to improve the program the Board of Trustees and Administration, in coordination with employees, should make adjustments and monitor how well the program performs as a result. Sharing the results of monitoring and evaluation within the workplace, and celebrating successes, will help drive further improvement.

PROGRAM EVALUATION and improvement includes:

- Administrative personnel establishing, reporting, and tracking goals and targets that indicate whether the program is making progress.
- Administrative personnel evaluating the program initially, and periodically thereafter, to identify shortcomings and opportunities for improvement.
- Administrative personnel providing ways for employees to participate in program evaluation and improvement.

Action Item 1: Monitor performance and progress (school-wide)

The first step in monitoring is to define indicators that will help track performance and progress. Next, Administrative personnel, and employees will establish and follow procedures to collect, analyze, and review performance data. Both lagging and leading indicators should be used. Lagging indicators generally track employee exposures and injuries that have already occurred. Leading indicators track how well various aspects of the program have been implemented and reflect steps taken to prevent injuries or illnesses before they occur.

How the District will accomplish it:

- Administrative personnel will develop and track indicators of progress toward established safety and health goals.
 - Track lagging indicators, such as:
 - Number and severity of injuries and illnesses
 - Results of employee exposure monitoring that show that exposures are hazardous
 - Workers' compensation data, including claim counts, rates, and cost
 - Level of employee participation in program activities
 - Number of employee safety suggestions
 - Number of hazards, near misses, and first aid cases reported
 - Amount of time taken to respond to reports
 - Number and frequency of management walkthroughs
 - Number and severity of hazards identified during inspections
 - Number of employees who have completed required safety and health training
 - Timely completion of corrective actions after a workplace hazard is identified or an incident occurs
 - Timely completion of planned preventive maintenance activities
 - Employee opinions about program effectiveness obtained from a safety climate or safety opinion survey
- Administrative personnel will analyze performance indicators and evaluate progress over time.
- Administrative personnel will share results with employees and invite their input on how to further improve performance.
- When opportunities arise, Administrative personnel will share experiences and compare employee results to similar facilities within your organization, with other school Districts.

Action Item 2: Verify that the program is implemented and is operating (school-wide)

Initially and at least annually, District Administrative personnel need to evaluate the program to ensure that it is operating as intended, is effective in controlling identified hazards, and is making progress toward established safety and health goals and objectives. The scope and frequency of program evaluations will vary depending on changes in MSCA standards; the scope, complexity, and maturity of the program; and the types of hazards it must control.

How the District will accomplish it:

- Administrative personnel will verify that the core elements of the program have been fully implemented.
- Administrative personnel will involve employees in all aspects of program evaluation, including reviewing information (such as incident reports and exposure monitoring results); establishing and tracking performance indicators; and identifying opportunities to improve the program.
- Administrative personnel will verify that the following key processes are in place and operating as intended:
 - Reporting injuries, illnesses, incidents, hazards, and concerns
 - Conducting workplace inspections and incident investigations
 - Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective
 - Collecting and reporting any data needed to monitor progress and performance
- Administrative personnel will review the results of any compliance audits to confirm that any program shortcomings are being identified. Verify that actions are being taken that will prevent recurrence.

Action Item 3: Correct program shortcomings and identify opportunities to improve (school-wide)

Whenever a problem is identified in any part of the safety and health program, District Administrative Personnel in coordination with employees, will take prompt action to correct the problem and prevent its recurrence.

How the District will accomplish it:

- If Administrative personnel discover any program shortcomings, actions will be taken as needed to correct them.

- Administrative personnel will proactively seek input from employees and other stakeholders on how the District can improve the program.
- Administrative personnel will determine whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.
- Administrative personnel will determine whether current performance indicators and goals are still relevant and, if not, how the District can change them to more effectively drive improvements in workplace safety and health.

Employees learn to accept as normal the risk they live with every day. Unfortunately, their comfort level can serve to lower the rigor and urgency with which policies and procedures are implemented. Developing and maintaining a healthy sense of respect for workplace exposures is critical to creating a culture in which employees understand the importance of consistently following the DISTRICT-WIDE SCHOOL SAFETY and HEALTH PROGRAM.

GLOSSARY OF TERMS

Close call/near miss: An incident that could have, but did not, result in death, injury, or illness. They signal that hazards are not being adequately controlled or that new hazards have arisen.

Contractor: An individual or firm that agrees to furnish materials or perform services at a specified price.

Elimination: A change in process or workplace condition that removes the hazard or ensures that no worker can be exposed to a hazard under any foreseeable circumstances.

Hierarchy of Controls: A system for selecting and implementing the most effective control solutions for workplace hazards that includes: • Elimination. • Substitution. • Engineering controls. • Administrative controls. • Personal protective equipment. This is known as the “hierarchy of controls” because they should be considered in the order presented. Controls at the top of the hierarchy are potentially more effective and more protective than those lower in the hierarchy.

Host Employer: An employer who has general supervisory authority over the worksite, including controlling the means and manner of work performed and having the power to correct safety and health hazards or require others to correct them.

Industrial Hygiene: The science of protecting and enhancing the health and safety of people at work and in their communities.

Job Hazard Analysis: A technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationships among the worker, the task, the tools, and the work environment.

Joint-Employed Worker: A worker hired and paid by a staffing agency and assigned to work for a host employer, whether or not the job is actually temporary.

Lagging Indicators: Measures of the occurrence and frequency of events in the past such as the number or rate of injuries, illnesses, and fatalities.

Leading Indicators: Measures intended to predict the occurrence of events in the future. Leading indicators are proactive, preventative, and predictive measures that provide information about the effective performance of safety and health program activities that can drive the control of workplace hazards.

Metrics: Measures of performance.

Non-routine Operations: Operations that do not occur frequently or that occur as a result of an emergency.

Peer-to-Peer Training: A type of on-the-job training where workers exchange information about hazards, controls, reporting procedures, and work procedures that are relevant to the safety and health program.

Quantitative Exposure Assessment: Techniques used to quantitatively measure workers' exposure to hazards, particularly health hazards, such as sampling for chemicals, dusts, biological organisms, noise, radiation, or other assessments. The purpose of such assessments is to quantify the level of workers' exposure to a hazard. Also known as exposure monitoring.

Root Cause Analysis: A collective term that describes a wide range of approaches, tools, and techniques used to uncover causes of problems.

Emergency Contact Information

Liberty County Superintendent of Schools Office
Liberty County Courthouse
Mailing Address: P.O. Box 684 Chester MT 59522
406.759.5216
supt@co.liberty.mt.gov

Montana Department of Public Health and Human Services (DPHHS)
Public Health & Safety Division
1400 Broadway (Cogswell Building)
Helena, Montana 59403
(406) 444-4141

American Association of Poison Control Centers
Emergency. Information. Prevention. 1-800-222-1222
PoisonHelp.org

US Department of Labor
Occupational Safety and Health Administration (OSHA)
800-321-6742 (OSHA)
Billings Area Office
Art Hazen, Area Director
2900 4th Avenue North, Suite 303
Billings, Montana 59101
(406) 247-7494
(406) 247-7499 FAX

The Montana Department of Labor & Industry
Safety and Health Bureau
Phone: (406) 444-6543
Fax: (406) 444-4140
Mail P.O. Box 8011
Helena, MT 59604-8011

Montana State Fund
Workplace Safety and Assistance Division
855 Front Street
Helena, MT 59601
1-800-332-6102

Liberty County Sherriff's Office
111 East Adams Avenue
Chester, Montana 59522
(406) 759-5171

**Liberty Elementary School District
School Building Physical Address and Contact Numbers**

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Eagle Creek Hutterite Colony
333 2100 Road South
Galata, Montana 59444
(406) 432-2581 ext. 111

Information contained in this LIBERTY ELEMENTARY SCHOOL DISTRICT, DISTRICT-WIDE SCHOOL SAFETY and HEALTH PROGRAM & EMPLOYEE RESOURCE MANUAL has been compiled and formatted by 4 Poles Educational Consulting Group.