

FALL 2023

# RISKmanager



## INSIDE...

**SAFETY  
PROACTIVITY VS.  
REACTIVITY**

PAGE 1

**HOW SAFE ARE  
YOUR SWIMMING  
POOL'S DRAINS?**

PAGE 3

**INSPECTION  
CHEAT SHEET**

PAGE 7



**CM  
REGENT™**  
INSURANCE COMPANY





## Thinking Ahead...

By Edgar Boord

# SAFETY PROACTIVITY VS. REACTIVITY

It goes without saying that preventing incidents before they happen is the goal. However, it can often be easy to fall into a primarily reactive approach to safety. Accounting for every single scenario, outcome and changing conditions is impossible, but a truly proactive approach to safety can have a substantial impact on risk minimization and incident prevention. In this article, we will discuss methods for instituting proactive safety approaches through administrative measures and safety committee/safety team operations.

Reactivity often creates an endless loop of incidents and surface-level resolution. Follow-up to an incident and an investigation may take place; however, there should be “preventative” actions that address root causes to coincide with any “corrective” actions that may only address the surface causes of that specific incident. Here are examples of surface-level resolution/reactivity as well as preventative/proactive measures that will minimize risk to a much larger degree:

- **Reactive** – After a slip/fall on ice, responsible individuals are now directed to spot-treat the area that is prone to refreezing throughout the day.
- **Proactive** –
  - ✓ Develop ice and snow removal procedures to include initial plowing/removal as well as routine spot checks.
  - ✓ Develop a checklist of spot check areas (i.e., ramps/slopes/steps, snow drift areas, areas prone to refreezing, parking lots, and entrances/foot traffic areas).
  - ✓ Develop policy for staff arrival (after removal takes place) on inclement weather days, as well as dedicated entrances so removal can be focused on specific areas.
- **Reactive** – An employee strains their back after lifting a 60-pound box from a shelving unit, so the department was trained in proper lifting and strain prevention.
- **Proactive** –
  - ✓ Assure heavier items are stored at waist level to reduce strenuous reaching/bending.
  - ✓ All staff in physically demanding positions are trained on the topic annually and reminded of safe lifting procedures on occasion.
  - ✓ Material handling/moving equipment and other assistive devices are made available to reduce strain potential.
  - ✓ Assure ADA-compliant physical requirements are outlined in each job description, and maximum lift limits are set at acceptable levels for each position.

## Best Practices/Actionable Items

Administrative safety provides the foundation for proactivity through the development of related policies, programs and procedures, such as the ones mentioned above. Furthermore, an employer that is engaged and promotes safety allows for a conducive safety culture to develop and grow. Ultimately, an aware and safety-conscious workplace will stand the best chance at reducing incident frequency and severity.

- A great way to identify areas in need of attention is to analyze incident trends in frequency and severity over the course of several years to identify the following:
  - Incident type/category (slips/trips/falls, strains, struck by incidents, cuts/burns, student-related injuries, chemical injuries/illnesses, etc.).
  - Positions prone to incidents.
  - Areas of the workplace with higher incident frequency.
  - Equipment or tools involved in incidents.
  - Other trending factors that may be leading to incident potential.
- Annual training on prominent safety topics and routine distribution of awareness information can go a long way in preventing employee behaviors and lack of individual awareness that often lead to incidents. Remember, complacency is the enemy of safety!
- Develop and implement policies, programs and procedures that can enhance safety in the workplace among staff, including but not limited to:
  - Housekeeping programs.
  - Snow/ice removal and spot check procedures, as well as staff arrival/designated entrances.
  - Pre-employment screening process to include screening for physical capabilities.
  - New hire safety and training program.
  - Step stool/ladder safe use policy/discouraging improper use of chairs, tables and desks.
  - Safety procedures relating to use of tools/equipment/machinery and powered industrial equipment.

- Severe weather/emergency preparedness plans, procedures and preventative maintenance.

A proactive safety committee can also be an excellent resource for minimizing risks in the workplace. Obvious reactivity will take place with a monthly recap of incidents; however, the hazard inspection process, safety suggestions/concerns and other operations may allow for efforts to be rolled out before an incident has a chance to occur. Here are proactive measures that an effective safety committee can provide:

- Thorough, routine hazard inspections of the buildings and grounds. Site-specific checklists can help assure safety items are not missed.
- Encouraging employees to submit safety suggestions/concerns for review allows for safety to become a collective effort, rather than just the responsibility of the committee members.
- Collective brainstorming and research to identify root causes of incident trends, solutions for safety concerns and methods for assisting the school's administration to develop effective policies/programs/procedures.

A focus on safety is key. When safety is shown to be a priority, and employees are provided with the tools/resources to carry out their workday safely, these are the building blocks for a safety culture to grow. Involvement and inclusion of the workforce in these principles may have a lasting impact on how safety is perceived in a positive manner. Reinforcing the resources and operations that allow for proactivity, as mentioned in this article, then allow for effective physical and written controls to be implemented. With a flourishing safety culture, this can be accomplished with much less effort.

## BLOG

Learn more about managing risk at [cmregent.com/blog/](https://cmregent.com/blog/).



# How safe are your swimming pool's drains?

By Mark Nease



**Have a safety question?**

Ask our experts  
at [cmregent.com/  
risk-control/ask/](https://cmregent.com/risk-control/ask/)



How safe are your swimming pool's drains? Depending on the age, condition and type of drain fixtures, your swimming pool's drains may present a dangerous condition to your students. A federal act that took effect in 2008, called the Virginia Graeme Baker Act, requires owners/operators of public swimming pools to install a special drain cover in their swimming pools. These drain covers are intended to prevent a suction effect that can cause a swimmer to be pulled toward the bottom of the pool and remain underwater with no ability to escape. This special drain cover is commonly referred to as an *anti-entrapment drain cover* or a *VGBA drain cover*. When installed correctly, the VGBA drain cover will minimize any suction effect when water passes through the drain, which will keep your school's swimmers safe as they enjoy their time in the pool.

## Risks/Best Practices

### Does your swimming pool have anti-entrapment drain covers that are functioning perfectly?

- **End of Service Life** – Have your anti-entrapment drain covers surpassed their end of service life? Manufacturers produce these covers with varying lengths of service lives. A quick internet search can reveal that these devices have a longevity anywhere from three to 10 years. Which ones do you have?
- **Hardware** – When you installed the anti-entrapment drain covers, did you use the exact hardware that came in the packaging? If you used alternative hardware, then your swimming pool drain covers may right now be unsafe.
- **Recall of Drain Cover** – Your anti-entrapment drain covers might remain within their service life, but has the manufacturer of these devices ever recalled them? The Consumer Product Safety Commission shows that some of these devices have been recalled – [Recall of Pool and Spa Drain Covers: Frequently Asked Questions | CPSC.gov](#). If your devices are on the recall list, you will need to immediately replace them.
- **Uncertainty** – Without thorough records of pertinent information, such as the drain covers' manufacturer, the last date of installation and the manufacturer's date of end of service life, you could have anti-entrapment drain covers that are putting your swimmers at a substantial risk to injury or death. If you are uncertain about any of this information, you should consider replacing these covers. Going forward, be sure to document and keep on file all information pertinent to the installation of the device as well as to set a future reminder of when the devices will reach their end of service life and your staff will need to be replace them again.

Take time today to familiarize yourself with the drains on your school's swimming pool. Are your drains compliant with the Virginia Graeme Baker Act? Consider items such as the length of time until they reach an end of service life, the hardware the installers used to install them, if the manufacturer ever recalled them and if you are uncertain about pertinent details of the installation. Finding answers to these considerations may help you determine your school's compliance to the VGBA and the need to take corrective action.





# LIGHTNING PROTECTION SYSTEMS

By Jake Ruziecki

We often talk about preparedness and impacts associated with tornadoes, hurricanes and flooding; however, we may not recognize the need to plan for risks to people and property associated with lightning. According to the National Oceanic and Atmospheric Administration (NOAA), 26% of storm related deaths between 1974 and 2003 were caused by lightning. The National Fire Protection Association (NFPA) also reported lightning strikes caused an estimated 35,000 fires and accounted for \$223 million in direct property damage on an annual basis between 1994–1998. During these extreme weather events, communities often rely on schools, police stations, fire stations and other critical infrastructure to offer support or refuge. While educational organizations are generally more prepared for remote operation in the event of an impact to critical building infrastructure, it's still important to consider not only life safety, but also the effects associated with the loss of building use caused by a lightning strike, and potential prevention measures to help mitigate the effects of such lightning strikes.

## Risks

Lightning strikes are reported to occur up to 25 miles from the central area of a storm, which may give a false sense of safety when you're seemingly "outside" of the storm. This is why it is important to identify personnel and groups who may be exposed to such lightning strikes and provide training on how to respond to the dangers.

Lightning also poses risks to buildings and critical systems including:

- Exterior heating, ventilation, and air-conditioning equipment.
- Information Technology (IT) equipment such as computers and servers.
- Rooftop solar panels and solar farms.
- Above-ground fuel storage tanks.



## Best Practices/Actionable Items

In the event of and planning for a thunderstorm with life safety in mind:

- People should not go outdoors or remain outside. Instead, seek shelter in buildings, dwellings and enclosed automobiles, buses or other vehicles with metal tops and metal bodies. Individuals should also be trained to avoid smaller buildings that offer little protection such as sheds, gazebos, tents and nonmetal or open-top vehicles, such as convertibles, recreational vehicles, golf carts and tractors. Remember, "When thunder roars, go indoors!"
- Consider developing an emergency response plan for events and activities organized by the school or that occur on school grounds. Activities on school grounds often take place where individuals may be exposed, such as in open fields, athletic fields, bleachers and grandstands, or parking lots. These areas are considered high hazard during storms as they offer little to no protection.
- Avoid use of or contact with electrical appliances, telephones and plumbing once adequate shelter has been reached.
- In some circumstances, adequate shelter to protect against lightning may not be readily accessible. In these cases, seek lower elevation areas and avoid higher hilltops and locations. Avoid isolated trees as they are likely the highest point in the surrounding area; instead, seek out dense woods. If you are exposed in an isolated area without cover, crouch as low as possible with your feet as close together as possible. Do not lie flat on the ground or place your hands on the ground, as this increases the area of your body in contact with the ground.

## BLOG

Learn more about employee safety at [cmregent.com/blog/](https://cmregent.com/blog/).

Protecting objects and structures requires a different approach. Rather than trying to avoid lightning strikes, installed lightning protection systems serve to intercept lightning before it can strike the object or structure it is designed to protect, and redirect the lightning current where it can be safely discharged to the earth. These systems are especially critical in school buildings where unprotected strikes could lead to fire and simultaneous disabling of critical safety systems such as fire alarms and emergency lighting.



- Traditional lightning protection systems include air terminals or lightning rods, which are strategically placed along the highest points of the building and its projections. These air terminals are connected by conducting cables, which provide the path for the lightning to be discharged to the grounding rods and ultimately absorbed into the earth safely.
- Tanks containing flammable or combustible liquids and gases stored at atmospheric pressure have a history of being ignited by lightning strikes. Periodically inspect these storage systems to ensure all rivets, bolts and welds are in satisfactory condition, and all vapor openings are closed or equipped with flame arrestors. These above-ground storage tanks should also be located at least 100 feet from the nearest building to reduce the risk of fire spread.

For further assistance or evaluation of your organization's lightning exposure and response plans, you can reference *NFPA 780, Standard for the Installation of Lightning Protection Systems*, or contact our Risk Control Department at CM Regent Insurance Company.

### Sources:

NFPA 780, Standard for the installation of Lightning Protection Systems  
NFPA 30, Flammable and Combustible Liquid Code  
NFPA 70, National Electric Code  
National Oceanic and Atmospheric Administration (NOAA)



# Inspection Cheat Sheet

By Derek Neubauer

Turnover in key school administration positions is inevitable. Often, people who have gained knowledge over the years leave the administration and may be replaced with someone who is not as familiar with all the inspections needed in the school buildings and at what frequency. Below is a “cheat sheet” that can be used by new administrators or existing staff to ensure all requirements for inspection are completed.

Required Inspections		
Inspection Type	Frequency	Performed By
Stage Rigging/Curtain FlameResistance	Annual	Qualified Inspector
Interior Bleachers/Exterior Bleachers-Grandstands	Annual Biannual	In-House Qualified Inspector
Wood Stadium Light Poles	Annual	Qualified Inspector
Elevator	Annual	State & Qualified Inspector
Boilers	Annual	State & Qualified Inspector
AEDS	Monthly Visual Annual	In-House Staff Qualified Inspector
Kitchen/Paint Booth Automatic Extinguishing System Inspection	Annual	Certified Technician
Climbing Walls	Annual	Certified Technician
Fire Extinguishers – All Extinguishers – All Extinguishers – All Extinguishers	Monthly Visual Annual 6-year maintenance/Recharge	In-House Staff Certified Technician Certified Technician
Fire Alarms	Annual	Qualified Inspector
Vehicle Lifts & Hoists	Annual	Certified Technician
Sprinkler System – Visual Inspection – Inspection/Testing – 5-year Internal Inspection	Monthly Annual Every 5 years	In-House Staff Outside Company Outside Company



Required Inspections		
Inspection Type	Frequency	Performed By
Forklift/Aerial Lift	Pre-Trip	In-house Operators
Misc. Gymnasium Equipment (wrestling mat hoists, basketball goal safety straps, folding walls, rolling curtains)	Annual	Outside Company
Roof Inspections	At least bi-annual	In-House Staff
Playground Equipment Inspections	At least annual	In-House Staff
Plumbing Inspections	At least annual	In-House Staff
Pottery Kiln Inspections	At least annual	In-House Staff
Safety Committee Building Inspections	Each building annually	Safety Committee Members

A good inspection program is the key to finding smaller issues before they become much larger, more expensive and time lost problems. When looking for a company to perform these inspections, it is best to contact the manufacturer and/or installer for their recommendations. As always, you can contact your Risk Control Consultant if you have any questions about these inspections.

\*Please note, this may not be all the inspections required for your organization.



**Have a risk question?**

Ask our risk experts at  
[cmregent.com/risk-control/ask/](https://cmregent.com/risk-control/ask/)





# EMERGENCY

## Action Planning

Emergency planning for schools plays a critical role in ensuring the safety and well-being of students, faculty and staff in the face of unforeseen crises. Schools are entrusted to provide a secure environment for learning, and preparedness for emergencies is a fundamental aspect of that commitment. Whether it's medical emergencies, acts of violence, severe weather, or other unforeseen events, having a comprehensive emergency plan in place is essential to effectively respond to and mitigate potential risks.

### Risks:

- During an emergency such as a fire, students, staff and faculty may not know the established rally point for all building occupants. Without vital information like this, people may be left behind or unaccounted for while awaiting emergency services.
- In a school district with multiple buildings located throughout a community, a school without an emergency action plan may not have an established chain of command to direct students, faculty and staff during an emergency. This could lead to not only confusion and panic but may delay assistance from emergency services.
- If a school district/building is unprepared after an emergency, such as a school shooting, news coverage and local forms of communication may deem a school or administration unfit to educate and protect students in the community.

### Best Practices/Actionable Item:

- **Repetition:** Conduct regularly scheduled drills for every aspect of an emergency action plan. Confirm everyone involved is aware of plans and procedures in place for a specific emergency suitable for their role in the emergency action plan. Confirm that drills are being conducted quickly and effectively to avoid complacency.

- **Collaboration:** Work with local emergency services and offer your facilities for training if possible. Allowing EMS/Fire/Police personnel to practice emergency response drills within your facility will decrease response time and increase effectiveness in an emergency.
- **Review/Revise:** Regularly review and improve your emergency action plans to reflect specific hazards you may encounter. Keep in mind the special hazards that may exist for your department/building. This should be done at least once a year to avoid any pitfalls.
- **Chain of Command:** Establish a chain of command within the school district to be able to provide accurate information to emergency services, building occupants and the public. The FEMA Intermediate Incident Command System (ICS) is considered a standard for emergency services and response teams within the U.S. A simplified version of this could be used to streamline building specific operations during an event.

The most vital aspect of a school's response to an emergency is having a plan in place that all students, staff and faculty are familiar with and are willing to participate in to mitigate potential loss. Emergency action planning should be clear, concise and easily interpreted by people of all ages and abilities. These plans should be reviewed and practiced frequently enough to not encourage complacency, but also completed in a timely manner to consistently provide accurate resources for all involved. Additional resources are available to aid in this practice. The Department of Education ([schoolsafety.gov](https://schoolsafety.gov)) and the Federal Emergency Management Agency (FEMA) both offer in depth resources and trainings suitable for general and site-specific emergency action planning.



**Have a safety question?**

Ask our experts at  
[cmregent.com/risk-control/ask/](https://cmregent.com/risk-control/ask/)





300 Sterling Parkway, Suite 100  
Mechanicsburg, PA 17050  
Toll-free 844-480-0709

[CMRegent.com](http://CMRegent.com)



© 2023 Church Mutual Insurance Company, S.I. The information contained in these materials is intended solely to provide general guidance on topics that may be of interest to you. While we have made reasonable efforts to present accurate and reliable information, CM Regent Insurance Company and its affiliates disclaim all liability for any errors or omissions or for any actions you take or fail to take based on these materials. The information provided may not apply to your particular facts or circumstances; therefore, you should seek professional advice prior to relying on any information that may be found in these materials. NAIC # 12356