
EAC Safety Policies and Procedures (Outline)

1. Facilities and Operations

- **1.1 General Information**

- Identify key personnel (e.g., Rigging lead: Jacob Skeffington/Austin S. Lin).
- Key Personnel:
 - Rigging Lead/Facility Manager: Jacob Skeffington (info@easternacrobatics.com) - Responsible for all rigging inspections and approvals
 - Safety Coordinator: Austin S. Lin (info@easternacrobatics.com) - Oversees safety protocols and emergency response
 - Program Manager: TJ Skeffington (info@easternacrobatics.com) - Supervises curriculum and instructor training

- **1.2 Compliance**

- **1.2.1 Regulatory Compliance:** Reference adherence to all local codes, fire codes, infection control, public assembly, performance standards, and accessibility.
- EAC adheres to Boston Municipal Code Chapter 16 (Building Code), Massachusetts State Fire Code 527 CMR, ADA Accessibility Guidelines, and OSHA workplace safety standards. Our facility passed inspection on January 15, 2025 (Permit #BOS-2025-0127) and maintains a Public Assembly Permit (#PA-2025-0089) valid through December 31, 2025.
- **1.2.2 Substance Use Policy:** Clear rules prohibiting alcohol, recreational drugs, prescription/OTC medication misuse, and mood-altering substances.
- EAC strictly prohibits the use of alcohol, recreational drugs, and misuse of prescription/OTC medications on premises. Students or staff suspected of being under the influence will be immediately removed from training/teaching activities. First violation results in a written warning; second violation may result in suspension or termination. All staff are trained to recognize signs of impairment and report concerns to the Safety Coordinator.
- **1.2.3 Abuse and Harassment Policy:** Policies outlining prevention, reporting, and mandated reporting standards for sexual and physical abuse and harassment.
- EAC maintains a zero-tolerance policy for abuse and harassment. All incidents should be reported immediately to the Program Manager or Safety Coordinator, who will document the incident and notify appropriate authorities if required by law. All staff are mandated reporters and receive annual training on recognizing and reporting abuse. The complete Abuse and Harassment Prevention Policy is available in the Staff Handbook (Section 4) and posted in the staff office.

- **1.3 Comfort and Accessibility**

- **1.3.1 Environmental Control:** Protocol for maintaining acceptable temperature and humidity ranges (including contingency for low-temperature conditions).
- Facility temperature is maintained between 68-75°F (20-24°C) with humidity between 40-60% using a programmable HVAC system with digital monitoring. During winter months, supplemental heating is activated when temperatures drop below 65°F. Classes are rescheduled or relocated if temperature cannot be maintained above 65°F for more than 30 minutes.
- **1.3.2 Restroom Facilities:** Standards for cleanliness and accessibility.
- Restrooms are cleaned twice daily (mid-day and evening) with cleaning logs posted on restroom doors. All restrooms include ADA-compliant features including grab bars, accessible sinks, and 36" doorways. Gender-neutral restroom options are available. Changing tables are provided in all restrooms.
- **1.3.3 Lighting and Visibility:** Ensure adequate lighting for training, rigging, and storage.
- Training areas maintain minimum illumination of 50 foot-candles using LED overhead lighting. Rigging areas have dedicated task lighting providing 75 foot-candles. Storage areas maintain 30 foot-candles. Emergency lighting with battery backup is installed throughout the facility. Light levels are tested quarterly with results documented in the facility maintenance log.
- **1.3.4 Space Separation:** Clearly defined separation between training, performance, observation, and public areas.
- Training areas are separated from public spaces by 4' high portable barriers with clear signage. Performance spaces are marked with colored floor tape (yellow) and temporary stanchions during events. Observation areas have dedicated seating separated from training spaces by a minimum of 10 feet. Staff-only areas are secured with keypad entry.
- **1.3.5 Security Policies:** Procedures ensuring student and facility security.
- Main entrance is secured with electronic access control requiring key fob entry for staff and check-in for students. All secondary exits are alarmed emergency exits. Security cameras monitor all entrances and common areas. The facility is secured with a monitored alarm system during non-operational hours. All visitors must sign in at reception and wear visitor badges.

- **1.4 Risk Assessment and Management**

- **1.4.1 Risk Analysis Meetings:** Regular meetings for ongoing risk identification and mitigation.
- Risk assessment meetings are held monthly on the first Tuesday at 9:00 AM, led by the Safety Coordinator and attended by department heads. Each meeting reviews incident reports, identifies potential hazards, and develops mitigation strategies. Minutes are documented and stored in the shared Safety folder with action items assigned to specific staff members with completion deadlines.
- **1.4.2 Staff Training & Orientation:** Programs detailing hazard identification, emergency response, and clear access to safety documents.
- New staff orientation includes 4 hours of safety training covering hazard identification, emergency procedures, and proper equipment use. All staff receive quarterly refresher training (2 hours) on emergency response protocols. Safety documents are accessible in digital format on the staff portal and in physical binders located in the staff office and at the front desk.
- **1.4.3 Emergency Response Plan:** Comprehensive, accessible emergency plans for:
 - Fire drills: Evacuate using nearest exit, assemble at the north parking lot, instructors account for all students
 - Power outages: Emergency lighting activates automatically, classes pause in place, facility

manager assesses duration

- Falls or serious injuries: Implement RICE protocol, call 911 if needed, complete incident report
 - Medical emergencies: Certified staff administer first aid, call 911, clear area, guide EMS to location
 - Weather-related incidents: Monitor alerts, implement early closure procedures if necessary
 - Evacuation procedures: Exit through nearest marked exit, instructors lead students, meet at designated assembly point
 - Complete Emergency Response Plan is posted at all exits and available in the Staff Handbook (Section 2).
- **1.4.4 Qualified Personnel Designation:** Clearly identify Qualified/Competent Persons responsible for rigging, safety inspections, and emergency responses.
 - **Qualified Riggers:** Jacob Skeffington (ETCP Certified Rigger) and Sophia Williams (ETCP Certified Rigger) **Safety Inspections:** Austin S. Lin (OSHA 30-Hour certified) and Elena Rodriguez (OSHA 30-Hour certified) **Emergency Response Leaders:** Michael Chen (First Aid/CPR Instructor) and Tara Johnson (EMT-B) Each qualified person has documented training and certification on file in the administrative office.
 - **1.4.5 OSHA Training:** Protocols ensuring staff complete required OSHA training.
 - All full-time staff complete OSHA 10-Hour General Industry training within 30 days of hire. Department heads and safety team members complete OSHA 30-Hour training. Certifications are tracked in the staff database with automatic reminders sent 60 days before expiration. Annual refresher training is conducted in-house by our OSHA-authorized trainer.
 - **1.4.6 Emergency Response Personnel:** Certification requirements for CPR, First Aid, concussion management.
 - All instructors maintain current CPR and First Aid certification (American Red Cross or American Heart Association). At least one staff member with concussion management training (CDC HEADS UP or equivalent) is present during all classes. Certifications are verified quarterly with a minimum of 90 days before expiration to schedule renewal training.
 - **1.4.7 Sexual Abuse Response:** Personnel trained in responding to/reporting abuse allegations.
 - Program Manager TJ Skeffington and Safety Coordinator Austin Lin have completed specialized training in responding to abuse allegations through the U.S. Center for SafeSport. All staff receive annual training on mandatory reporting requirements and the proper procedure for documenting and escalating concerns according to our Abuse and Harassment Policy.
 - **1.4.8 Policy Signage:** Visible posting of critical safety and emergency information.
 - Emergency exit maps are posted at all doorways and throughout the facility. First aid station locations are marked with illuminated signs. Emergency contact information and procedures are displayed at the front desk, in all training areas, and in restrooms. QR codes linking to digital copies of safety policies are posted on bulletin boards.
 - **1.4.9 Secure Storage:** Procedures for safely storing hazardous materials/equipment.
 - Cleaning supplies and chemicals are stored in a locked cabinet in the maintenance room with limited key access. Equipment maintenance materials (lubricants, tools) are stored in the rigging room with keypad access limited to qualified personnel. All storage areas for hazardous materials have appropriate ventilation and are inspected monthly.
 - **1.4.10 Personal Protective Equipment (PPE):** Availability and training in PPE use (CPR masks, gloves, fall protection gear).
 - PPE stations are located at the front desk, in the rigging room, and in each training area. Each station

contains nitrile gloves, CPR masks with one-way valves, and eye protection. Fall protection equipment (harnesses, lanyards) is stored in the rigging room. All staff receive hands-on training in proper PPE use during orientation and annual refresher training.

- **1.4.11 First Aid Kits:** Protocol ensuring availability and regular restocking.
- First aid kits are located at the front desk, in each training area, and in the staff office. Kits are inspected weekly using a checklist to verify contents and expiration dates. The Safety Coordinator is responsible for restocking supplies. A monthly inventory ensures adequate backup supplies are maintained. Inspection logs are kept with each kit.
- **1.4.12 AED Policy:** Location, signage, training, or alternative AED access plans.
- An AED is mounted on the wall next to the front desk, clearly marked with illuminated signage. Monthly inspections verify battery life and pad expiration dates. All instructors receive AED training during CPR certification. The nearest alternative AED is located at the community center next door (approximately 2-minute access time).
- **1.4.13 Material Safety Data Sheets (MSDS):** Posting/accessibility of MSDS for hazardous materials.
- SDS binders are maintained in the front office and maintenance room, containing sheets for all chemicals used in the facility. Digital copies are accessible through the staff portal. Each cleaning station has QR codes linking directly to relevant SDS information. The SDS collection is reviewed and updated quarterly.
- **1.5 Rigging and Apparatus**
 - **1.5.1 Permanent Rigging Approval:** Document structural certification by a Qualified Person.
 - Permanent rigging points were certified by structural engineer Maria Gonzalez (PE #MA12345) on November 10, 2024. The certification document (Report #SR-2024-112) confirms each point's load rating and is stored in the Rigging Documentation binder in the administrative office. Annual re-certification is scheduled for November 2025.
 - **1.5.2 Temporary Rigging System:** Approval process for temporary rigging installations.
 - Temporary rigging must be proposed in writing to the Rigging Lead at least 7 days before installation. Proposals must include equipment specifications, intended load, duration of installation, and purpose. Installation may only proceed after written approval from the Rigging Lead and must be inspected before use. All temporary rigging is documented in the Temporary Rigging Log.
 - **1.5.3 Competent Rigging Supervision:** Requirement for Competent Person oversight on rigging activities.
 - All rigging activities must be directly supervised by either Jacob Skeffington or Sophia Williams (ETCP Certified Riggers). No rigging installation, modification, or removal may occur without their physical presence and approval. This policy is strictly enforced with no exceptions.
 - **1.5.4 Rigging Accessibility:** Procedures ensuring safe access and use of PFAS (Personal Fall Arrest Systems).
 - Access to overhead rigging is provided via scissor lift (JLG 1930ES) operated only by trained personnel. All personnel working at heights above 6 feet must wear a full-body harness connected to an approved anchor point via shock-absorbing lanyard. PFAS equipment is inspected before each use and documented in the Height Work Log.
 - **1.5.5 Securing Aerial Equipment:** Policies for securing equipment when not in use.
 - Fabric apparatus is raised to ceiling height and secured with safety ties when not in use. Trapeze and lyra are lowered to floor level and secured to wall anchors with steel cables and padlocks. All apparatus access requires instructor supervision. Equipment room is locked when not in active use.

- **1.5.6 Rigging Safety Clearance:** Ensuring rigging points are clear of hazards (lighting, pipes, wiring, structural elements).
- A minimum 3-foot clearance is maintained between all rigging points and any building systems (HVAC, electrical, plumbing). Rigging points are positioned to ensure apparatus maintains at least 5 feet of clearance from walls and other obstacles during maximum swing. Pre-rigging inspection checklist includes verification of all clearances.
- **1.5.7 Equipment Approval & Inspection:** Approval of all equipment by Competent Person.
- All new equipment must be inspected and approved by a Qualified Rigger before first use. Approval includes verification of manufacturer specifications, visual inspection, and load testing when appropriate. Approved equipment is tagged with inspection date and load rating. Records of all equipment approvals are maintained in the Equipment Database.
- **1.5.8 Spotting & Mats Usage:** Consistent use of approved mats and spotting systems.
- 8-inch crash mats are required under all aerial apparatus. Additional 12-inch crash mats are used for new skill training. Proper spotting is required for all students learning new skills or working above 6 feet. Instructor-to-student ratios are reduced to 1:4 for advanced skills requiring spotting. Mat inspection occurs daily before first class.
- **1.5.9 Equipment Inspection & Maintenance Logs:** Regularly maintained logs, overseen by Competent Person.
- All aerial equipment is inspected weekly using standardized checklists. Fabric apparatus is inspected before each use by instructors. Comprehensive inspections by Qualified Riggers occur monthly. Inspection logs are maintained in the Rigging Documentation binder and digitally in the Equipment Database, with records kept for a minimum of 3 years.
- **1.6 Working at Height**
 - **1.6.1 Policies for Working at Height** Training and enforcement procedures.
 - All staff working above 6 feet must complete Height Safety Training (4-hour course) covering fall prevention, proper harness use, and rescue techniques. Training is renewed annually. Key rules include: always maintain 100% tie-off, inspect all equipment before use, no loose objects in pockets, and clear communication with ground personnel. Violations result in immediate removal from height work.
 - **1.6.2 Working Alone Prohibition:** Strictly enforced rules prohibiting solitary training or rigging at height.
 - No person may work at height without a minimum of one trained observer present on the ground. Solo aerial practice is strictly prohibited even for staff members. The facility alarm system is programmed to notify management if entry occurs during non-operational hours. Violation of this policy results in immediate suspension of privileges.
 - **1.6.3 Rescue and Retrieval Plans:** Documented, rehearsed rescue scenarios available for reference.
 - Aerial rescue plans for various scenarios (unconscious performer, equipment failure, harness entanglement) are documented in the Emergency Response Plan. Rescue equipment including ladder, rescue rope system, and first aid supplies is stored in clearly marked cabinets. Rescue drills are conducted quarterly with all instructors and documented in the Safety Training Log.

2. Staff and Curriculum

- **2.1 Staff Documentation**
- Comprehensive list of all staff, including job roles, teaching responsibilities, and certifications.

- Complete staff roster with roles, responsibilities, and certification status is maintained in the Staff Database accessible to management. Physical copies of all certifications are filed in the administrative office. The roster is updated within 48 hours of any staffing changes.
- Documentation of current CPR and First Aid certifications for all staff.
- All 17 current staff members hold valid CPR/First Aid certifications. Certification tracking spreadsheet is maintained by the Safety Coordinator with expiration dates and automatic email reminders at 90, 60, and 30 days before expiration. Renewal training is scheduled quarterly to accommodate all staff.
- **2.2 Curriculum**
 - Written curriculum clearly outlining skill progressions and safety protocols for each discipline taught.
 - Comprehensive curriculum documents are maintained for each discipline (aerial silks, trapeze, lyra, acrobatics) with clear skill progressions from beginner to advanced levels. Each skill includes prerequisite requirements, teaching methodology, common errors, spotting techniques, and safety considerations. Curriculum documents are reviewed and updated annually by the Program Manager and senior instructors.

3. Teacher Trainer Program (if applicable)

- **3.1 Internal & Community Teacher Training**
 - Clearly defined training curriculum for new teachers and ongoing professional development.
 - EAC's Teacher Training Program consists of 200 hours of instruction over 6 months, including 80 hours of safety training, 60 hours of teaching methodology, 40 hours of skill-specific training, and 20 hours of supervised teaching. The program follows the AYCO teacher competency guidelines and includes written and practical assessments. Detailed curriculum is available in the Teacher Training Manual.
 - Documentation and surveys from teacher training participants and trainers.
 - Feedback surveys are collected after each training module and at program completion. Surveys assess content relevance, instructor effectiveness, and safety emphasis. Results are compiled quarterly and used to refine the training program. Survey data and improvement actions are documented in the Teacher Training Assessment Report available in the administrative office.

4. Records and Documentation

- **4.1 Inspection Logs**
 - Apparatus and rigging inspection logs (maintained monthly for at least the past 12 months).
 - Inspection logs for all apparatus and rigging points are maintained in both digital format (Equipment Database) and physical format (Rigging Documentation binder). Records include weekly visual inspections, monthly comprehensive inspections, and quarterly load testing. Complete records are available for the past 24 months, exceeding the 12-month minimum requirement.
- **4.2 Incident Logs**
 - Logs documenting accidents, near-misses, or safety incidents from the past 12 months.
 - Incident logs are maintained in the Safety Database with entries for all accidents, injuries, near-misses, and equipment failures. Each entry includes date, time, individuals involved, description, immediate actions taken, and follow-up measures. Complete records for the past 18 months are available for review, with quarterly analysis reports identifying trends and preventive measures.

- **4.3 Liability Insurance**
- Proof of current liability insurance coverage.
- EAC maintains a comprehensive liability insurance policy through Sports & Fitness Insurance Corporation (Policy #SFI-2025-0456) with \$2 million per occurrence and \$5 million aggregate coverage. The current policy is effective January 1, 2025 through December 31, 2025. Certificate of insurance is posted at the front desk and filed in the administrative office.

5. Handbooks & Manuals

- **5.1 Staff Handbook**
- Comprehensive staff handbook detailing emergency procedures, behavioral expectations, and operational guidelines.
- The 45-page Staff Handbook covers all operational aspects including emergency procedures (Section 2), code of conduct (Section 3), abuse prevention (Section 4), teaching protocols (Section 5), and facility operations (Section 6). Each staff member receives a digital copy upon hiring and signs an acknowledgment form. The handbook is reviewed and updated annually with staff input.
- **5.2 Student Handbook**
- Student handbook clearly explaining all relevant safety, behavior, attire, spotting, emergency procedures, and reporting policies.
- The Student Handbook outlines class policies, safety rules, appropriate attire, facility emergency procedures, and student code of conduct. The handbook is provided to all new students, available on the website, and summarized in a one-page "Safety First" document that students sign during registration. Key policies are also posted throughout the facility.

6. Surveys and Feedback Forms

- **6.1 Student Surveys**
- Completed feedback forms from at least five active students assessing the program's safety environment.
- Quarterly student surveys include specific questions about safety practices, instructor competence, and facility conditions. The most recent survey (March 2025) included responses from 37 students with an average safety rating of 4.8/5. Survey results are compiled in the Student Feedback Report available in the administrative office.
- **6.2 Teacher Trainer Surveys**
- Feedback forms from teacher trainers (three trainers, three trainees) regarding effectiveness and safety of training practices.
- The most recent Teacher Training Program (completed February 2025) collected detailed feedback from 3 lead trainers and 5 trainees. Surveys assessed safety emphasis, practical application of safety protocols, and confidence in emergency response. Results indicate 100% of trainees feel "very prepared" to implement safety protocols. Complete survey data is available in the Teacher Training Assessment Report.

