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Administrative Letter A120

Student Safety in High School Theaters

Administrative Letter #120 Student Safety in High School Theaters

Date: January 1, 2017; Updated April 22, 2026

FROM: Richard Holmes, Superintendent

REGARDING: Student Safety in High School Theaters

This letter is drafted to clearly define the Washington County School District's (WCSD) position on several common safety concerns that are not otherwise addressed in district policy. When WCSD personnel are responsible to supervise students in theaters, they must ensure that the protocols addressed in this letter are both understood and enforced. Additionally, the following list should not be considered comprehensive and may be added to as practices or concerns arise that present inherent safety risks to staff or students.

GENERAL SAFETY

- Theater teachers must administer an orientation addressing how to properly utilize powered equipment (powered saws, hand drills, welding tools, etc.), fly systems, theatrical electrics, theatrical sound systems, catwalk safety, personal protective equipment (PPE), restricted areas, the location of emergency equipment (eyewash station, first-aid kits, AED's, fire alarms pulls, fire extinguisher location(s), etc.) and other hazardous processes for all students enrolled in technical theater classes, or who may be authorized to utilize theatrical equipment.
    - Orientation should be administered *before* students are permitted to engage in such processes.
- Training records must be created and maintained for every student or volunteer who will have access to the auditorium or technical theater facilities.

EGRESS

- Hallways should not be utilized as storage rooms – even temporarily. Egress hall width must be maintained wall to wall.
- Pursuant to NFPA Chapter 13.2.5.6.3 theatrical auditoriums, small theaters, gymnasiums, lecture halls, etc. must not have additional seating added to aisle ways (folding chairs for example). Aisle width must never be reduced to accommodate additional seating.
- Pursuant to OSHA CFR 1910.37(b)(2) each exit must be clearly visible and marked by a sign reading “Exit.”
- Pursuant to OSHA CFR 1910.37(a)(3) Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route.
- Before each show or production held in a high school auditorium, a standard announcement should be communicated to the audience advising them of the location of emergency exits.

EMERGENCY PREPAREDNESS

- Some emergency situations, such as severe weather events, power outages, or active shooter situations may require performers, crew, and patrons to shelter in place.
- Theater professionals shall determine how to secure facilities and where personnel, patrons, and students would gather should a lock down occur.

CATWALKS

- Students are prohibited from accessing the catwalks without express permission from and supervision by the theatrical teacher, unless they are part of a technical theater (stagecraft) class, and have been trained on best practices regarding theatrical safety.
- Personnel are prohibited from accessing the catwalks unless such access is necessary within the scope of their employment.

CONFINED SPACES

Confined spaces are areas large enough to be entered and perform assigned work; they have limited or restricted means of entry or exit; and are not designed for continuous occupancy. Examples include: covered orchestra pits, elevator pits, house cove (attic) lighting positions, plumbing runs; and boilers

- Confined spaces must not be entered unless the entrant is properly trained and authorized.
- Confined spaces must not be entered unless there is a justifiable need.

ELECTRICAL

- Household type extension cords with only two prongs are inappropriate and may not be utilized in WCSD facilities.
- Equipment that utilizes three-pronged power cords must have all three prongs in order to operate. In the event that the grounding prong on an electrical cable becomes damaged, the equipment should be taken out of service until the defective cable can be replaced.
- It is never appropriate to utilize cables that have been spliced together using electrical tape in a WCSD facility.
- Suspended lighting equipment must have a safety cable attached to prevent the lighting equipment from falling to the ground should the light experience a clamp failure.
- Daisy chaining, or plugging electrical components into each other in a linear series, is against the fire code and cannot be performed in WCSD theaters. This includes, but is not limited to, plugging extension cords into extension cords, and plugging extension cords into power strips or surge protectors.
    - An exception is made for LED lighting systems which are specifically designed to utilize a daisy chain method.
- Cables shall never be wrapped around support beams or catwalk guardrails.
- Lighting equipment must be used as directed by the manufacturer.

WEAPONS

- Real weapons such as knives, swords, guns, etc. may never be used as props.
- Prop weapons such as knives, swords, guns, etc. must be cleared by the school administrator before use.

COSMETICS | THEATRICAL MAKEUP | HAIR

Sharing makeup and makeup applicators may result in the transmission of diseases, such as conjunctivitis. A primary key to makeup application safety is keeping it clean.

- Makeup must be applied with clean brushes.
- Makeup tools shall not be shared between people unless cleaned and sanitized between users.
- Makeup shall be stored in a cool dry location.
- Mascara shall be replaced every three months.
- Other makeup shall be replaced every 6 months.
- Disposable applicators shall be kept in sealed containers.
- Clean and sanitize brushes, combs, curlers, etc. and place them in sealed labeled bags.
- Inspect power cords on curling and flat irons as well as hair dryers, prior to putting them away.

FIRE SAFETY

- The use of pyrotechnics in WCSD auditoriums is prohibited.

    - This includes, but is not limited to open flames and fireworks
- WCSD theatre professionals are prohibited from adjusting, disabling, or otherwise tampering with fire panels.
- Access to fire panels is restricted to approved personnel.
    - With rare exception, teachers are not considered approved personnel.
    - Students are never considered approved.

WELDING

- Students, parents, and volunteers are prohibited from welding in school district facilities outside of automotive and welding shops.
    - Auditoriums, parking lots, technical theater classrooms and hallways are not considered welding shops.
- Except when in use by a custodial or maintenance professional for facility maintenance, welding materials will not be stored within a theater or technical theater shop.
- When welding on WCSD grounds, students, parents, and volunteers are prohibited from welding without the direct supervision of a welding or shop teacher.
- Appropriate personal protective equipment shall be worn when a staff member, volunteer or student performs welding activities.
- Helmets, soldering goggles, and hand shields shall be inspected for leaks, openings, or highly reflective surfaces. These should be replaced when needed.

FALL PROTECTION AND FREE FALL HAZARDS

- Students should never work where they are exposed to a height of six (6) feet or greater.
- Students exposed to significant falling hazards must stay within “safe zones.”
    - Safe zones are defined as areas behind handrails, areas that are clearly marked with tape or paint, catwalks, etc.
- Should a student need to cross beyond the safety of a handrail, to hang theatrical lighting for example, they must wear a full body harness with a rip-stop lanyard and a point of tie off that can withstand a 5000 lb. shock load.
- Handrails must never be stood or climbed upon.
- Pursuant to OSHA’s general duty clause, hard to see fall hazards such as the edges of theatrical stages must have glow tape affixed so as to clearly define the edge of the stage in dim lighting.
- Backstage lighting must be established in order to prevent falls. During set construction, and also during production and other low-light situations, flashlights or other means of lighting must be used in order to prevent slips, trips and falls.
- Orchestra pits are designated for orchestral music. Persons shall not be permitted to jump, leap, or otherwise fall into the pit. When not in use, orchestra pits shall be covered with the flooring provided by the school district.
    - Exception is made for theatrical stages designed with trap doors. In such cases, students may enter and exit through trap doors, however, such entrances and exits must not include free falling of the actor.

    - Exception is made for schools that utilize netting equipment designed specifically for the school's orchestra pit. Such netting must be designed, certified and approved by a company that specializes in theatrical netting applications. School's must discuss proposed netting acquisitions with WCSD Risk Management prior to purchasing any netting equipment designed to catch actors who fall into the orchestra pit.
- Volunteers, staff members and students shall wear appropriate attire, to include closed toed shoes, when working with powered equipment.
- Volunteers, staff members, and students shall not wear rings, watches, necklaces or other jewelry or loose clothing when using hand and power tools.
- Long hair shall be restrained to be kept away from machinery tools and points of operation.

LADDER SAFETY

- Always maintain 3-points of contact (two hands and a foot, or two feet and a hand) when climbing. Keep your body near the middle of the step and always face the ladder while climbing.
- Never use the top step/rung of an a-frame ladder as a step/rung.
- An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support and it must be tied off at the top.
- Do not stand on the three top rungs of a straight, single or extension ladder.
- Folding ladders shall never be used in an unfolded position.
- Persons shall always face ladders when ascending or descending.

HOUSEKEEPING

- Pursuant to WCSD policy 1500.3.1.10 and OSHA 29 CFR 1910.22(a)(1), all places of employment, passageways, storerooms and service rooms shall be kept clean, orderly, and in a sanitary condition.
- Theatrical technical rooms must dispose of excess material remnants, oil-soaked rags, sawdust, metal shavings, salvage, debris, etc. that could create a fire hazard, impede egress or access.
- Pursuant to OSHA 1910.159(c)(10), excess material, remnants, salvage and debris should not be stacked within 18 inches of the ceiling.
- Excess material, remnants, salvage and debris should be stacked in a clean an orderly manner.
- Excess material, remnants, salvage or debris should be discarded if there is insufficient storage space.
- No storage or costuming may be hung from fire suppression pipes. These pipes must be labeled with signs like "never hang anything from this pipe." Similar signage must be posted near low hanging suppression sprinkler heads stating, "Never hang anything on the sprinkler heads."
- Storage beneath stairways is not permitted.
- Nothing may be stored within 18 inches of a fire sprinkler.
- Stored items may not extend beyond the storage shelf.

MOBILE EQUIPMENT

- Pursuant to WCSD Administrative Letter 114, students and non-employees are prohibited from operating or riding in mobile equipment. This includes, but is not limited to the following:
    - Forklifts, man lifts, cherry pickers, scissor lifts, Gators, four-wheelers, golf carts, riding lawn mowers, etc.
- Pursuant to WCSD Administrative Letter 114, only WCSD personnel who have been trained and authorized to operate mobile equipment may access lights, set pieces, props, and other items that may require a lift in order to reach.
    - Regardless of training, students may never be authorized to operate mobile equipment.
- Keys should never be left in a lift when the operator is not present.

HAZARDOUS CHEMICALS

- Chemical labels must not be removed. Maintain hazardous chemicals in their original packaging.
- Containers containing chemicals shall be closed when not in use.
- Technical theater shops must be equipped with eyewash stations near chemical storage.
- Paint thinner shall not be used in order to remove paint, dye, or ink from skin.

FLYING

- Definitions
    - Aerial Stunts (flying): Airborne maneuvers or tricks performed by an actor and assisted by line, rope, cable, or other mechanical device.
- WCSD theaters may not perform aerial stunts unless a 3rd party company whose primary function is theatrical rigging installs, supervises and performs the rigging service.
    - WCSD personnel will defer to 3rd party professionals regarding safety on, above, and below aerial stunting fly systems and equipment.
- 3rd party theatrical rigging (aerial stunting) companies must provide a certificate of insurance naming the school district as additionally insured prior to the installation of their equipment.
- Rock climbing, repelling, or other companies whose primary function is outdoor recreation are inappropriate for high school theatrical rigging.
- The use of aerial silks is prohibited.
- Students may not perform aerial dancing.

VOLUNTEERS

- Pursuant to WCSD Policy 1105, all WCSD Volunteers must fill out form 544, Volunteer Orientation and Agreement.
    - Pursuant to Utah HB175, volunteers who may have significant unsupervised access to students must submit to a criminal background check and provide references for each qualifying position in the last 3 years.

- Within the context of theatre education, a volunteer may include, but not be limited to the following:
  - A vocal coach.
  - An individual who assists in the construction of theatrical sets.
  - An individual who assists in painting theatrical sets, signage, auditorium stage, etc.
  - An individual who applies makeup.
  - An individual who creates theatrical costumes.
  - An individual who transports students or set pieces.
- WCSD students are never considered volunteers.
- Pursuant to Utah State Risk Management's Performing Arts Safety Manual, volunteers who will be utilizing or otherwise working in the auditorium must receive an initial overview of the department/facility safety plans and complete an orientation about critical emergency response procedures and life safety equipment.

Employees who willfully disregard established safety policies and procedures have no expectation of liability coverage. When working within the course of employment, WCSD personnel who supervise students have a duty to ensure student safety. Failure to abide by or enforce these safety procedures may result in disciplinary action.

Richard Holmes
Superintendent
Washington County School District

Dated: 4/22/2026