



Preventing exposure to COVID-19 School Buses (“Vehicles”)

June 17, 2020

Introduction:

As the global pandemic of COVID-19 persists, CUPE wants to ensure that employers and members continue to implement leading practices to prevent workplace exposure to the virus which causes COVID-19.

The guidance in this document is specific to addressing the hazard related to COVID-19. It is intended to assist CUPE health and safety activists in their efforts to ensure that adequate protections are in place for members. In the case of those workplaces that have suspended operations, the guidance is intended to assist in implementing effective controls prior to the resumption of normal operations.

The information linked below helps highlight some of hazards that increase the likelihood of exposure. Find CUPE’s COVID-19 resources here:

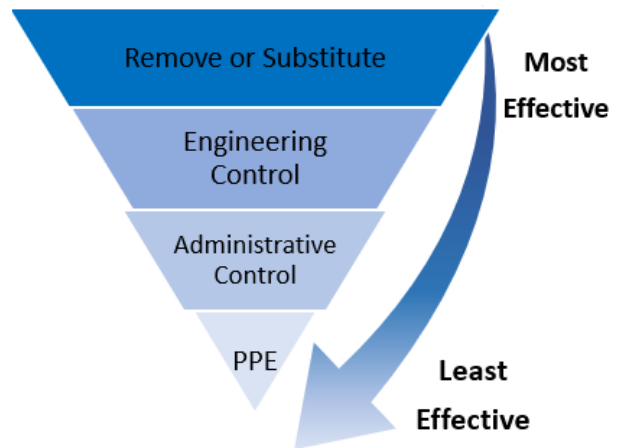
- [General Occupational Guidelines for COVID-19](#)
- [COVID-19 Fact Sheet](#)
- [COVID-19 and the Right to Refuse Unsafe Work](#)
- [COVID-19 Cleaning and Disinfecting](#)
- [COVID-19 Personal Protective Equipment](#)
- [COVID-19 and the Use of Masks and Respirators](#)
- [COVID-19 Masks and Face Coverings](#)
- [Good Hygiene Practices and the Respiratory \(Cough\) Etiquette](#)

It remains vital that employers continue to work with their (joint) health and safety committee about the best way to control sector-specific hazards during this pandemic.

This document provides specific guidance to CUPE members working as transportation workers for schools and social services, not for large scale public transit. General guidance can be found [HERE](#) and should be reviewed in conjunction with this document and the specific sector documents which apply to your workplace which can be found [HERE](#).

Hierarchy of controls

Occupational Health and Safety (OH&S) is concerned with identifying workplace hazards and implementing control measures that reduce the risk of hazards leading to illness or injury. In the field of OH&S there is a concept called the “hierarchy of controls”. This is the broad category of controls that can be used to address hazards found in the workplace. They range from the strongest controls (eliminating the hazard) to the weakest controls (personal protective equipment PPE).



Personal protective equipment (PPE) is not the most effective hazard control. It is a last resort when the hazard cannot be adequately addressed using more effective controls “up” the hierarchy. Due to pervasive media coverage of PPE shortages across the world, and due to PPE’s vital role as one of many control measures that workplaces utilize, there is a common misconception that PPE is the best (or only) hazard control that can protect workers from COVID-19. This is a potentially dangerous assumption. It limits the discussion to, and consideration for, stronger control measures. CUPE members, locals and health and safety activists should be pushing for the best protections for their members.

When choosing controls, don’t forget other hazards and how they might be affected by new controls (for example, the hazard of working alone while practicing physical distancing and reduced number of people in the workplace or the PPE needed for cleaning). Also ensure that controls do not introduce new hazards into the workplace.

All the following sample hazard controls should be considered in addition to any other legislative and regulatory requirements such as policies and procedures for working alone, preventing violence, and so on.

Workers have a unique and important perspective in evaluating the effectiveness of controls proposed by the employer as they understand best how these tasks are performed in practice and what impediments there may be to implement administrative controls.

Remember: control of hazards related to COVID-19 are just one part of a much larger employer health and safety program. **All the following hazard controls must be continuously monitored, evaluated, updated and revised in conjunction with your Health and Safety Committee or representative.**

Additional Measures for School Buses

The [general sector sheets](#) provide guidance on *screening, physical distancing, cleaning and other general controls*, and should be reviewed as part of a broad infection control program. Individual risk assessments must be completed to assess the hazards related to different factors including:

- type of vehicles;
- characteristics of the students: age, special mobility needs, need for adult accompaniment;
- worker and student vulnerabilities and pre-existing conditions; and
- time spent on vehicles, routes and detour factors

The following are additional controls specific to school buses as opposed to public transit and other forms of transportation or multi-person vehicles.

Employers are required to provide access to washroom and hygiene facilities for anyone entering their workplace as part of their work. Workers need to be provided with access to an appropriate washroom and washing facilities to be able to maintain adequate hygiene. This may include mobile washrooms, soap and water, hand sanitizer, disinfectant solutions, and disinfectant wipes. Risk assessments should consider the fact that under normal circumstances, workers may have had access to facilities not directly linked to their employer, such as fast-food or retail outlets.

Elimination

Workplaces should be designed to remove hazards whenever possible. All employers must take every precaution reasonable to eliminate the potential of exposure to COVID-19. The virus can be easily spread among workers and students where required controls are not in place. Due to the nature of a school setting, including vehicles, close contact with students and workers is inevitable. As such, employers must eliminate the possibility of a person, including a worker, child, parent, or guardian, etc. with a suspected or confirmed case of COVID-19 from accessing the workplace. For example:

- Workers who are sick must remain home. Employers should have clear rules around paid self-isolation and quarantine for those who are sick, or those who have been exposed to someone who has COVID-19. These plans should include how to handle situations with infected family members.
- Cancel all in-person non-critical programs until further notice.
- Conduct programs and meetings using a shared communications program (Facetime/Skype/zoom).
- Reduce the use of paper that will be handled by multiple workers with the use of electronic documents.
- Meetings with external visitors should be pre-screened by phone or computer before appointments are scheduled using the most recent medical definitions for COVID-19

from provincial health officers, Ministry of Health and / or Centres for Disease Control and Prevention.

Engineering controls

This category of controls involves using barriers or separations to prevent employees from being exposed to hazards. For example, plexiglass barriers and other hard or soft material (including vinyl) surfaces have become a common application during the COVID-19 pandemic, installed at points of contact with clients or other workers or when two metres (six feet) of distance cannot be maintained in all directions.

Wherever possible, it is better to create permanent or semi-permanent barriers before utilizing administrative controls or personal protective equipment. For example, many of us have become accustomed to seeing plexiglass barriers for cashiers at the grocery store that separates them from the customers.

For school buses, consider some of these engineering controls:

- If it is practical, workers should use the same vehicle each day.
- If installed, barriers should not have exposed sharp edges and should remain fixed in place either when in use or if stored away, while the vehicle is in motion.
- Ventilation systems can play an important role in preventing the spread of infections through the utilization of filters that catch the majority of particles and adjusting the system to mix in more fresh air. Ensure that vehicle ventilation systems are operating as designed and inspected according to manufacturer specifications. This may also include opening the windows and roof vents (if applicable) in the vehicle).
- Ensure that that vehicles remain compliant with all applicable *Canada Motor Vehicle Safety Standards* under the *Motor Vehicle Safety Regulations* and to applicable CSA D250 Standards, including those for glazing, flammability and compartmentalization. For aftermarket installations of shields or enclosure systems, the provincial and territorial authorities maintain jurisdiction and are responsible for setting and enforcing any requirements. Please refer to the joint Transport Canada and Canada Standard Association D250 Technical Committee at: <https://www.tc.gc.ca/en/services/road/joint-guidance-document-transport-canada-csa-d250-school-bus-technical-committee.html>
- Visual markers (such as tape on ground and signage) should be used to help promote physical distancing and to indicate single direction travel paths for worksites.
- Distribute disinfecting and sanitization materials so that they are available to the workers at point of use for all work sites.
- Determine new limits for the number of students and others permitted to enter the vehicle to maintain safe distancing of two metres (six feet) in all directions. Adjust this based on the size of the vehicle and locations of emergency exits.
- Adjust the type and size of the vehicle (use larger vehicles if they are available).
- If any changes have been made to the vehicle, there needs to be Risk Assessment conducted to ensure that safety, including visibility and visual distortion (such as creating

reflections or redirecting light), mechanism of breakage, potential injury, etc. from the barriers are assessed e.g. during a collision.

Administrative Controls

Administrative controls are workplace rules that control or alter the way the work is done. These may include the timing of work, policies and work practices such as standards and operating procedures. For the busing environment, consider some of these additional administrative controls:

- Employers must develop a comprehensive Exposure Control Plan, including ongoing hazard assessments (more than one may be required as circumstances, hazards and risks change) when anyone is confirmed or in contact with cases of COVID-19 or after having travelled internationally.
- If in-person meetings must happen limit meetings and hold meetings outside or in a large space to allow for physical distancing of at least two metres (six feet) between people.
- As much as possible, practice physical distancing between co-workers, parents, children and essential external visitors.
- Employers must have written COVID-19 policies, standard operating procedures and training programs for all classifications as part of their overall occupational health and safety information programs.
- Develop a method of clear and effective communication to workers because of how quickly information is changing. Workers need to *know what to do* in response to the changing working conditions.
- Update the Pandemic Plan, in consultation with the health and safety committee as often as necessary to protect workers
- When possible, limit the items children can bring on the bus from home.
- Workers who need to check in or retrieve vehicles from a central yard should do so in staggered times to minimize contact with others.
- When possible, physical distancing should be maintained, otherwise appropriate PPE must be provided (see below).
- Workers should self-assess prior to going to work, and during their shift.
- Employers must develop a memo to parents/guardians providing information and instruction about how to screen children for symptoms of COVID-19 and to keep them home if they are suspected of having the illness. This memo will also outline the process that will be followed if a student is identified with a potential illness at home or at the school. Information should emphasize that sending sick children to school endangers other children, workers, and overall public health and burdens the public health system.
- If physical barriers aren't possible, communication should be done at distances greater than two metres (six feet).
- Where job tasks require groups of workers to work routinely in proximity, consider creating cohorts, or small groups of workers that work together exclusively to reduce

the risk of broader transmission to other workers (for example, the same drivers and Education Assistants or the same vehicle maintenance workers).

- If possible, stagger start and finish times and split workers into groups, keeping the same groups together in order to reduce the risk of cross-contamination. Consider dispatching different groups from different locations, which will reduce the number of workers that are impacted in the event of a suspected or confirmed case of the virus.
- School boards should provide an additional person to assist the bus driver to ensure social distancing measures and other concerns are being upheld by students on the bus. This task cannot be added to an Education Assistant already providing support to a child during transit.

Cleaning and Disinfecting

- Sanitizing stations should be made available in the entrance of the vehicle.
- There should be a particular disinfection program to deal with any confirmed cases of COVID-19 including what surfaces are to be cleaned, when, how often, with what disinfectants and by whom. This should include personal protective equipment as required by the Exposure Control Program and Hazard Assessment (see PPE section below).
- Employers should have an appropriate waste management system to handle potential and contaminated waste (like used PPE) and ensure that workers know what those processes are.
- All garbage should be taken off the bus by the students and placed in bins at the schools or the student's home.
- If multiple drivers will operate the vehicles, provide workers with disinfection and sanitization products to clean vehicles between driver and passenger changes:
 - Disposable cloths
 - Paper towels and absorbent materials
 - Waste disposal bags and tape
 - Cleaning agents/disinfectants (and related PPE)
- The employer should ensure enhanced disinfecting of surfaces, particularly "high touch" surfaces in all workplaces, vehicles and equipment or any other work duty related surface.
- The entire bus should be cleaned and disinfected each day. For more information, see CUPE's fact sheet on [Cleaning and Disinfection](#). For a list of approved disinfectants for use against coronavirus (COVID-19), see [Health Canada's website](#). Areas of the bus that should be cleaned after each use include:

Common Contact Areas:

- Interior and exterior door handles
- Seats
- Seat belts
- Hand railings
- Floors
- Interior windows and wall section below passenger windows

- Inside and outside door handles (including manual control for service door)
- Inside door grab handles, pads and armrests
- Keys
- Steering wheel
- Shift lever and console
- Dashboard
- Turn signal and wiper stalks
- Mirrors
- Seat and Seat adjuster
- Wheelchair and assistive devices
- Any other parts that are commonly used and that may have been touched

High touch areas include:

- Handrails for entering and exiting the vehicle
- Arm rests
- Seatbelts (if applicable)
- Steering wheel
- Dash area
- Head rests
- Windowsills
- Interior Luggage Racks/Hand holds if applicable
- Wheelchair and assistive devices

Personal Protective Equipment

PPE is worn by individuals to reduce exposure when in close contact to suspected or confirmed cases of COVID-19. PPE is a last resort and the lowest level of hazard control. If it is required to be worn, employers must ensure that:

- If physical distancing cannot be maintained, workers should be provided, with fit-tested N-95 respirator (or greater).
- The equipment should be properly fitted, including respirator fit testing as necessary.
- Ensure staff vehicles are supplied with:
 - Hand sanitizers – with a concentration of at least 60% ethanol or 70% isopropanol disinfectant;
 - Tissues to catch coughs and sneezes; and
 - Wipes appropriate to ensure clean and disinfected surfaces, especially commonly touched vehicle surfaces and equipment (for example, steering wheel, door handles, dashboard, delivery carts).
- Provide disposable gloves if an employee is not able to frequently wash or sanitize their hands and must contact people or surfaces that have not been recently sanitized.
- The employer must provide appropriate training about when PPE must be worn, how it must be put on and taken off, disposed of, inspection for defects, and what its limitations are.

- The choice of PPE should not interfere with the driver's ability to access vehicle controls, or hinder or distort the driver's view – directly or through mirrors - of the road, students around the bus or of passengers.
- See Transport Canada's guidance *Personal Protective Equipment and their uses by Commercial Vehicle Drivers* available at link: <https://www.tc.gc.ca/eng/motorvehiclesafety/personal-protective-equipment-uses-commercial-vehicle-drivers.html>.
- Additional information about PPE is found in the general sector sheets.
- Workers have the right to refuse unsafe work. See the CUPE Health and Safety resources at <https://cupe.ca/health-and-safety>

Student Safety

- Children often don't present symptoms of the illnesses the same way as adults. Consult the latest guidance from public health on how to properly assess a child for symptoms of COVID-19.
- Layout the seating in the vehicle to promote a minimum of two metres (six feet) distance between each passenger unless an Education Assistant must sit closer in order to attend to a child. This may include alternating seats, diagonal seating, seating in every second row only, etc.
- Children from the same household are permitted to sit together and are not required to physically distance.
- Increase trips if necessary, to reduce the number of riders to manage physical distancing.
- There should be physical distancing (two meters/six feet) while students wait to board the vehicle and exit the vehicle, where possible. Visual markers (such as tape on ground and the bus aisle and signage) should be used.
- High touch areas should be cleaned between each trip (runs) from homes to school and school to homes if the bus makes multiple runs per day (see above for information on high touch areas).
- Masks are not recommended for use by unsupervised children unless advised to do so by a health care provider. In young children in particular, masks can be irritating and may lead to increased touching of the face and eyes.

:jj/cope491