

Occupational Safety and Health Administration (OSHA) Compliance

What About Churches?

OSHA applies to any business that affects interstate commerce. When do church activities qualify as a business that affects interstate commerce? Purely religious activities never do. For example, if your organist falls on the steps leading to your chancel, you will not have to worry about an OSHA citation.

On the other hand, if a church ventures beyond purely spiritual pursuits, it may subject itself to OSHA requirements. Schools and daycare centers are clearly businesses, and are engaged in interstate-commerce because their books, supplies, and equipment can come from various parts of the country.

Churches that run an educational institution must ensure that the employees are not subjected to safety hazards and that their activities comply with OSHA standards. People who work in the church's bookstore would be entitled to similar protection. Moreover, administrative personnel, such as an office manager, are theoretically covered by OSHA, though they do not often handle the hazardous substances to which OSHA normally applies.

A church could also be exposed to OSHA sanctions if it hires a contractor to perform remodeling work. If one of the contractor's employees is injured, he or she may sue the contractor for violation of an OSHA standard. The church will probably be sued as well, even though the church is relying on the contractor's expertise.

Fire Safety

Several OSHA standards regarding fire prevention deserve attention from church leaders. OSHA mandates that each workplace have exits that are located a certain distance apart from one another and are never blocked. It requires that buildings be stocked with fire extinguishers in good working order and that employees be trained to use them.

OSHA also dictates that employers have a written plan to facilitate escape in case of fire and that all employees be trained what to do in an emergency. Finally, OSHA demands that employers create and follow a fire-prevention plan that includes, among other things, procedures for disposing of flammable materials and controlling sources of combustion.

For example, if your music department plans a program that includes a procession with candles, ask questions about how that can be done without being a fire hazard. Walk the route to make sure no flammable material is in the way. Consider using battery-operated candles.

If your church has a kitchen, make sure that the stove is cleaned on a regular basis and that smoke alarms are installed in the cooking area.

Voluntary Compliance

Even though OSHA applies only to certain church activities, all churches would be advised to review its guidelines and voluntarily comply with them. The U.S. Department of Labor recommends that employers adopt a three-part plan to improve occupational safety and health:

1. Management and their employees must commit to protecting workers.

2. Work sites should be analyzed to identify dangerous situations. Danger should be prevented by redesigning a job or the site, or by controlling hazards.

3. Regular training in safety and health must be incorporated into regular job practices. These general principles can be readily adapted to a church environment:

- The pastor and property committee must commit to a program of increased safety and develop enthusiasm for the effort through communication with the congregation.
- Church leaders should regularly inspect the church grounds and buildings, identifying hazards and items that need fixing. Is the railing on the balcony loose? How old is the stepladder used by the custodial staff? This is an opportunity to do something about all those low-priority maintenance projects that never seem to get done.
- The staff can be trained to look for potential problems and report them to the property committee as soon as possible.

You can obtain more information by writing to the Department of Labor's Occupational Safety & Health Administration or by visiting <http://www.osha.gov/>. A safe working environment promotes good stewardship of the time and talents of your employees.

OSHA Regulations

Here are some OSHA regulations that may apply to church employees:

Walking-working surfaces: OSHA mandates that every stairway floor opening have a railing and that every pit and trapdoor floor opening have a cover of standard strength and construction. Passageways and storerooms should be kept clean and orderly, and floors should be neat and dry.

Ladders: Ladders must be in good condition and placed so that the rails have secure footing.

Means of exit: Exits, along with aisles and passageways leading to them, need to be situated so they are readily accessible. Exit doors should be side-hinged and easily recognizable, and should never include locks.

Protective equipment: Employers must provide personal protective equipment for the eyes, face, head, and extremities, including protective shields and barriers. OSHA focuses particularly on eye protection, requiring that devices protect against side hazards and that they fit over prescription lenses. An employer must survey work areas to determine whether such equipment is required.

First aid: If a medical facility is not located near the workplace, an employer should make sure that one employee is trained in first aid and that adequate supplies are available.

Lawn mowers: OSHA requires all mowers (walk-behind and riding) to have an enclosed blade and to carry a warning that the motor should not be used without a catcher assembly or guard. A caution label is required at each discharge opening.

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