1.0 PURPOSE

The purpose of this procedure is to describe how Albemarle County Public Schools distributes, documents, and responds to internal and external communications regarding its environmental activities, issues and concerns.

2.0 SCOPE

This procedure applies to:

- Albemarle County Public Schools employees within all various levels and functions of the school system, when engaging in internal communication relevant to the school system’s environmental activities.
- Select employees of Albemarle County Public Schools (outlined below) who communicate with external entities regarding environmental issues or concerns; these external entities may include, but are not limited to various members of the public, concerned parents of students, regulatory agencies, and the media.

3.0 RESPONSIBILITY

3.1 The Environmental Compliance Manager shall:

- Be the primary contact for receiving and responding to internal and external communication regarding the EMS and other environmental issues
- Collaborate with the EMS Steering Committee and EMS Core Team to develop and implement internal communication ideas and efforts
- Coordinate requests for public records or other information under the Virginia Freedom of Information Act (FOIA)
- Consult with the County Attorney’s Office regarding appropriate responses under FOIA
- Notify the Division Superintendent/designee of all FOIA requests that seek sensitive or confidential records or information from the School Division regarding environmental matters, as well as complaints or concerns of a serious nature regarding environmental issues from members of the public

3.2 The EMS Core Team shall:

This CONTROLLED document is maintained electronically. Printed versions are UNCONTROLLED
Collaborate with the Environmental Compliance Manager to develop and implement internal communication ideas and efforts.

3.3 All Albemarle County Public Schools Employees shall:

- Relay environmental or EMS-related questions, concerns, problems, and suggestions to the Environmental Compliance Manager, or their Division Manager or Supervisor, as appropriate.

3.4 Division Managers and Supervisors shall:

- Receive and respond to internal and external communication regarding the EMS and other environmental issues, as appropriate.
- Communicate external and internal EMS or environmental-related questions, concerns, problems, and suggestions to the Environmental Compliance Manager

4.0 PROCEDURE

4.1 Internal Communication

- Internal Communication regarding Albemarle County Public Schools’ EMS and other environmental issues and concerns will travel through the many levels and functions of the school system by various means, and may include:
  - Internal newsletters
  - Albemarle County Public Schools EMS Website
  - E-mails and memos
  - Posted bulletins
  - Staff meetings
  - On-the-job training
  - Videos
  - Standard Operating Procedures (SOPs)

- Information to be Communicated Internally
  - The Environmental Compliance Manager and/or EMS Steering Committee will determine on a case-by-case basis whether a specific type or piece of information is to be distributed to all
Albemarle County Public Schools employees or only to those affected.

- Examples of items to be communicated internally:
  - Existence of the Albemarle County Public Schools’ Environmental Management System (To be communicated to all employees)
  - Albemarle County Public Schools’ Environmental Management Policy (To be communicated to all employees)
  - Standard Operating Procedures (SOPs), and work instructions (To be communicated to affected employees only)
  - EMS Roles and responsibilities (Affected employees only)
  - Significant Aspects (Affected employees only)
  - Objectives and Targets (Affected employees only)
  - EMS progress and success, periodically (All employees)

- Annual Review
  - At least once annually the EMS Steering Committee will meet during the EMS Management Review to discuss the effectiveness and potential necessary changes/additions to these internal communication procedures.

4.2 External Communication

- Significant Aspects
  - Albemarle County Public Schools’ Significant Aspects and Objectives and Targets will be made available to the public upon request

- Public Requests for Information (FOIA)
  - In appropriate situations involving non-routine requests for information under the FOIA, the Environmental Compliance Manager will notify at least one member of the EMS Steering Committee and will consult with the County Attorney’s Office before responding to such FOIA request for information from any member of the public.
  - Requests for documents or records from the public under FOIA will be responded to in writing and within established time limits as required by law.
Requests for general information from the public (e.g. a parent requesting information regarding general asbestos procedures) may be responded to via phone, e-mail or in writing.

- Contact with the Media

  - The primary contact(s) with the media regarding environmental-related complaints, concerns, and information are any members of the EMS Steering Committee and/or Superintendent/designee. If deemed appropriate by the EMS Steering Committee, the Environmental Compliance Manager or designee(s) may act as contact person or resource to/for the media.

  - Department Supervisors may need to communicate with the public and/or media regarding environmental activities in the event that the Environmental Compliance Manager is not available, or in the event that they are contacted first. This should be communicated to the Environmental Compliance Manager so that the external communication is documented and maintained as a record and kept in the Environmental Compliance Manager’s files.

  - All complaints and concerns from parents of students and members of the public, regarding environmental activities, shall be documented and maintained by the Environmental Compliance Manager using the External Communication Log, A1-EMS-04, attached.

- Communication with Regulatory Agencies

  - The Environmental Compliance Manager shall be the primary contact for communicating and corresponding with environmental regulatory agencies such as the Virginia Department of Environmental Quality, the Virginia Department of Health, and the Environmental Protection Agency.

  - The Environmental Compliance Manager will save all electronic (e-mail) and other correspondence with regulatory agencies and maintain these records per state and/or federal record retention requirements.

5.0 RELATED DOCUMENTS

5.1 ISO 14001 Standard Excerpt 4.4.3, Communication
5.2 A1-EMS-04, External Communication Log