

ADVICE ON SAFETY IN SCHOOLS FOR EIS REPRESENTATIVES MARCH 2022

Context

1. The Scottish Government has issued Revised School Guidance, March 2022, in relation to Covid 19, which can be found [here](#). The stated aim of Scottish Government's Revised School Guidance is to support schools and local authorities in the delivery of education in light of the current COVID-19 situation in Scotland. The guidance is non-statutory.

2. This guidance replaces the previous Reducing Risks in Schools Guidance and should be used for the running of schools after the end of the Easter break in April 2022 until the end of the 2021/22 school session.

3. EIS representatives and members are asked to note this revised school guidance **does not** absolve employers of their responsibilities, duties and legal obligations with regard to health and safety, public health and their responsibilities under:

- the Health and Safety at Work etc Act 1974
- the Workplace (Health, Safety and Welfare) Regulations 1992 (as amended)
- the Personal Protective Equipment at Work Regulations 1992
- the requirements to undertake risk assessment under the Management of Health and Safety at Work Regulations 1999
- the Equality Act 2010.

4. The EIS believes that the existence of clear national guidance is essential to secure a level of consistency across the country which is important to the continuity of education. This revised guidance replaces the previous Reducing Risks in Schools Guidance and from an EIS perspective, falls short in specific areas. The EIS has registered a number of concerns:

- We are dismayed and angered that CERG (COVID-19 Education Recovery Group) has effectively been wound up without any discussion with the trade union representatives on the group.
- We believe the planned removal of asymptomatic testing arrangements for school staff is deeply regrettable and alarming. The advice for school staff and secondary pupils in mainstream and special schools to undertake twice-weekly asymptomatic LFD testing will no longer apply from 18 April 2022. This has been the subject of correspondence between the EIS and the Cabinet Secretary and members have been encouraged to register their dissent to the Government's decision.
- We have argued that too many of the current mitigations are being removed too quickly at a time when the Scottish Government acknowledges that COVID is not over and that it must remain vigilant and resilient given the uncertainties posed by the virus.
- We believe that the presumption **against** placing a greater restriction on children and young people than on the rest of society is flawed and

schools, given the current risks, should continue to have greater mitigations than the rest of society.

Actions required

5. The EIS will continue to provide support, advice and information to members in any workplace where there are concerns related to Covid health and safety issues. As a minimum, the EIS expects the following arrangements to be in place in all workplaces until the end of the 2021/22 school session:

- a review of all risk assessments, including for individual staff members and pupils for whom bespoke risk assessments have been/require to be in place, to ensure that suitable and sufficient assessments of risks have been undertaken before any mitigations might be removed.
- consideration of measures to maintain physical distancing where possible and to follow the wider societal guidance on physical distancing in schools or on dedicated school transport.
- consideration should be given to face coverings being worn by Primary staff, Secondary pupils and staff, and adult visitors to settings, in communal areas and when moving around the school building.
NB In relation to the bullet point points 2 and 3, careful attention should be given to the requirements of individuals with additional support needs when implementing measures.
- while face coverings will not be required in classrooms, learners and staff should continue to be supported to wear them if they choose to do so.
- greater emphasis being placed on adequate ventilation, by keeping windows open as much as possible, and doors open when operationally feasible and safe. (See Annex A of the Scottish Government Guidance)
- Annex A deals with the issues of ventilation and heating. As part of this process, local authorities are required to ensure that all schools and day care of children services have access to CO2 monitoring, whether via mobile or fixed devices. Details of what action should be taken for different CO2 levels are outlined in the guidance Annex A.

Risk assessments (paragraph 18 onwards)

6. In terms of risk assessments, the Scottish Government advice is that all local trade unions should be consulted with and involved in the development and updating of risk assessments for each establishment. School risk assessments should be shared with and be easily accessible to staff and trade unions. The risk assessments should be conducted by the employers in conjunction with trade unions and LNCTs. Thereafter, all members of the school community should understand what measures are being put in place and why.

Bespoke risk assessments should also be updated/ carried out for staff and pupils with heightened vulnerabilities.

All risk assessments should be revisited as local circumstances require.

Routine protective measures (paragraph 20 onwards)

7. Children, young people and staff must stay at home and self-isolate if they:

- have symptoms of COVID-19, whether they feel unwell or not
- have tested positive, even if asymptomatic
- are required to self-isolate for any other reason e.g. travel related reasons
- are identified as a close contact and are over 18 years and 4 months and not fully vaccinated.

Hygiene (Paragraph 27)

8. The revised guidance advises that schools should continue to support staff and children and young people to follow advice on good hand hygiene, and to ensure regular surface cleaning in schools and on school transport. In addition, effective respiratory and cough hygiene should be in place to minimise the risk of the transmission of COVID-19.

Ventilation (Paragraphs 28 to 31 and Annex A)

9. Previous Scottish Government guidance on ventilation continues to apply and is outlined in Annex A of the revised guidance. Local authorities should continue to ensure that all local authority schools and ELC settings have access to CO2 monitoring, whether via mobile or fixed devices.

10. The guidance states that action is required when the CO2 levels are above 1500 PPM (parts per million). This action could include purge ventilation or reducing room occupancy. While this figure is correct, the EIS recommends that action is taken **before** the reading reaches 1500 PPM and that corrective action should begin to be undertaken when the readings are between 800 and 1499 PPM. In addition, in indoor spaces where there is likely to be an enhanced aerosol generation rate (e.g. singing/drama, indoor PE when permitted) the aim should be to ensure ventilation is sufficient to maintain CO2 concentrations at lower levels. A figure of 800ppm is recommended by both the Scottish Government guidance and the EIS.

11. The Health and Safety Executive (HSE) has provided its own guidance on [ventilation and air conditioning](#) which it hopes should help to strike this balance between fresh air and thermal comfort. Reports from HSE 'spot checks' in schools highlighted that most schools were relying on windows and doors being open for long periods of time. The Fire Safety Risk Assessment should always be reviewed before any internal doors are held open.

12. Additional funding was provided by the Scottish Government to support the introduction of additional mitigations, including ventilation. Local associations should ensure that this additional funding was used to improve and enhance ventilation in schools, e.g. through the purchase of CO2 monitors. The monthly reporting of CO2 assessments should continue, as agreed with local authorities, until June 2022.

13. Existing EIS advice on ventilation is available on the EIS website.

<https://www.eis.org.uk/Content/images/corona/VentilationSummary.pdf>

Personal protective equipment (PPE) (Paragraph 34)

14. Personal protective equipment (PPE) includes single-use disposable gloves, disposable plastic aprons and face coverings. PPE should be readily available, and staff should be trained on its use. The use of PPE by staff should continue to be based on a clear assessment of risk and need for an individual child or young person, such as personal care where staff come into contact with blood and body fluids. Bespoke risk assessments for staff with heightened vulnerabilities might also determine the use of PPE.

Planning assumptions (Paragraph 38)

15. The revised guidance states that there are no restrictions on parents, carers or wider family members entering school buildings, although they will be expected to comply with the school's routine measures. It then adds that there are, therefore, no restrictions on "in person" parent/carer evenings. EIS representatives and EIS members should work to ensure that headteachers continue to work jointly with the trade unions to reach agreement regarding the arrangements for, and timings of, parent/carer evenings under the working time agreement of the establishment. In addition, suitable and sufficient risk assessments should be reviewed and updated in advance of these events taking place.

Pregnant women employees (Paragraphs 44 to 46)

16. Pregnant women employees have been included in the list of people at moderate risk (clinically vulnerable) as a precaution. This is because in a small proportion of women, pregnancy can alter how their bodies handle severe viral infections, and some viral infections such as flu, are worse in pregnant women.

17. It remains a requirement for employers to carry out a pregnancy risk assessment with pregnant women employees to ensure a safe working environment. Further information on protecting new and expectant mothers at work can be found on the HSE website <https://www.hse.gov.uk/mothers/>

Information on Coronavirus (COVID-19), infection and pregnancy FAQs is also available on the website of the Royal College of Obstetricians and Gynaecologists (RCOG) which is available [here](#)

Advice for EIS members

18. EIS members should:

- ✓ Ensure that there is consultation on the updated risk assessment for the establishment.
- ✓ Familiarise yourself with your establishment's updated risk assessment.
- ✓ Meet with the school rep to clarify and, finally, agree on a satisfactory risk assessment.

- ✓ Seek support from the school rep as necessary where a bespoke risk assessment requires to be updated or put in place for you.
- ✓ If there is not an updated risk assessment in place, or it does not adequately address the concerns of members, or is not followed, then your local association secretary, should be informed by the school rep or nominated individual.
- ✓ If you reasonably believe that the arrangements in your establishment would put you at personal risk, seek advice from your local association secretary.

Mental Health

19. It is important that members do not neglect their own mental health. EIS advice is available on the website ('EIS Health and Wellbeing Support' - <https://www.eis.org.uk/Coronavirus/Directory>). Speak to your EIS rep if you feel you need support which you are not getting from the employer.

Revised Healthy Workplace Checklist Summer Term 2022

The following revised checklist should be used as a guide when considering Health and Safety issues and Scottish Government Guidelines issues relating to the control of Covid-19 within the workplace. They are by no means exhaustive.

Cleaning protocols

1. Are there enhanced cleaning provisions in place daily?
2. Has clear use and cleaning guidance for toilets been issued to ensure they are kept clean and physical distancing is achieved as much as possible?
3. Are suitable and sufficient procedures in place to ensure that commonly touched objects and surfaces (e.g. desks, handles, dining tables, shared technology surfaces etc.) are cleaned at least twice daily?
4. Has careful consideration been given to the cleaning regime for specialist equipment (e.g. in practical subjects or for children with additional support needs), sensory rooms, practical subjects with specialist equipment and dining halls, etc. to ensure safe use?

Hygiene and physical distancing measures

5. Are measures in place with sufficient time allocated for pupils and staff to clean their hands (with soap & warm running water or sanitiser) when they arrive at school, return from breaks, change rooms and before and after eating?
6. Is there access to enough sinks with hot water and soap for the number of staff in school?
7. Is there a hygiene protocol providing for regular hygiene breaks of sufficient length during the day? (Restrict the number of people using the toilet facilities e.g. using an engaged sign if necessary).
8. Is personal protective equipment (PPE) required? Is it adequately provided to staff?
9. Does every class have a supply of hand sanitiser (minimum alcohol 60%)?
10. Are arrangements in place to ensure every classroom and other work areas are always supplied with tissues?
11. Are lidded bins with double bagging available in every classroom and work area?
12. Does the school have appropriate signage alerting all to the need for high standards of hygiene?

Establishment Operations

13. Are rooms labelled to identify the maximum number of people to respect physical distancing requirements?
14. In primary schools, does the school plan to restrict the size of classes to no larger than one class?

15. Has the number of people in staff rooms at any one time been limited to ensure distancing can be maintained?
16. Have arrangements been made to ensure that physical distancing arrangements can be maintained in the school library?
17. Where limited catering facilities are provided, is there guidance on the need for food to be wrapped and only disposable cutlery provided.

Health

18. Is there a designated person with responsibility for keeping up to date with any changes to NHS, Health Protection Scotland or Scottish Government guidance?
19. Is there a designated person in the school responsible for ensuring that everyone in the school is aware of up to date symptoms of Covid19?
20. Is there a protocol for what to do where an individual develops Covid19 symptoms during the day?
21. Is there provision of an isolation area where any employees showing symptoms can be directed until they are able to leave site?
22. What additional control measures are in place to reduce the risk of any necessary visitors bringing the Covid19 virus into school or college inadvertently?

Travel

23. What consideration has been given to transportation difficulties for those staff who usually use public transport, with safeguarding being paramount, along with logistical issues?
24. Are car parking spaces clearly set out?

Visiting Specialists/Peripatetic Staff

25. Visiting teachers, educational psychologists, nurses, social workers, youth workers and those providing therapeutic support, who may be visiting between schools are required to be considered within all risk assessments and should act in accordance with the risk assessment for the establishment in which they are working.

Consultation

26. Have all staff been consulted and involved in all of the above?
27. Management should involve union reps at the outset and consult staff as widely as possible and practicable. Has this happened, involving union workplace reps and health & safety reps?
28. Does Management have an updated written Covid19 risk assessment register?
29. What formal process is there for reviewing the updated risk assessments and implementing revised control measures where appropriate and necessary?

30. Are Management reviewing updated risk assessments and protocols at regular intervals and when circumstances change, in consultation with staff and union representatives?
31. If control measures cannot be maintained within the school, what is the plan? Are staff aware of the plan?