Date: 23 November 2021

Our Ref: 211123/ALBON S/PR/TF

Ms Sarah Albon Chief Executive Health and Safety Executive

By email: sarah.albon@hse.gov.uk

Dear Sarah

## **Carbon Dioxide Monitors in Schools**

The NASUWT is increasingly concerned that the issue of ensuring sufficient ventilation in school buildings is becoming muddled by poor advice from the Department for Education (DfE) around the use of the carbon dioxide monitors that have been provided. We are writing to seek intervention from the HSE to support our efforts to ensure that schools can continue to remain open safely and to ensure that effective action is taken to minimise the risk of Covid-19 transmission within schools.

The NASUWT notes the HSE guidance on ventilation which states that 'where there is continuous talking or singing, or high levels of physical activity (such as dancing, playing sport or exercising), providing ventilation sufficient to keep CO2 levels below 800ppm is recommended'. Your guidance would apply to virtually every room in a school and gives clear guidance that ventilation in all school rooms should aim to be at a sub-800ppm level.

However, in stark contrast, DfE guidance states 'consistent value of over 800ppm will show as amber/orange and should be seen as an early indicator to increase ventilation'. This implies that nothing needs to be done for sporadic readings in excess of 800ppm, and worse also implies that nothing needs to be done even for consistent readings above 800ppm as it is merely an 'early indicator', rather than a trigger.

In addition, we are concerned that some of the monitors supplied by the DfE to schools state that figures between 800ppm and 1499ppm are 'normal', again presenting the view that nothing needs to be done at these concentrations, again contrary to HSE guidance.

More seriously, the DfE guidance also states 'a consistent value over 1500ppm CO2 concentration in an occupied space is an indicator of poor ventilation' without any indication of what to do in this eventuality. It also again implies that sporadic readings above 1500ppm need no action.



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In respect of high readings, the DfE also state that there is no reason to stop using a room where readings are above 1500ppm. This is directly contrary to the Workplace (Health, Safety and Welfare) Regulations 1992 which state that all rooms should have a sufficient quantity of fresh or purified air.

The NASUWT is deeply concerned that the DfE guidance may give rise to unsafe working practices in schools, and could result in schools being in breach of statutory regulation. As such the NASUWT believes the DfE guidance is in urgent need to correction with the assistance of the HSE. Regrettably, the NASUWT has raised these concerns with the DfE who claim that the HSE has endorsed the guidance for schools. We would ask for clarification from you as to whether that is the case.

The NASUWT requests that the HSE urgently assists in issuing clear and specific guidance for use by education settings on the issue of ventilation and  $CO_2$  levels, and takes such steps as necessary to ensure deficiencies within the guidance issued by the DfE to schools are addressed and rectified.

Yours sincerely

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Dr Patrick Roach General Secretary