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Our Reference: 202100258315  
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10 December 2021

Dear Patrick,

Thank you for your letter of 25 November 2021 regarding ventilation in schools.

The Scottish Government recognises that good ventilation is one of the most important ways in which we can reduce the risk of airborne Covid-19 transmission, and keep our schools as safe as possible. We have worked closely throughout the pandemic with expert bodies, local authorities and other key stakeholders to put in place and update comprehensive national guidance on ventilation and CO2 monitoring in schools.

Our guidance remains under regular review. As part of that, my officials are currently seeking the views of the Health and Safety Executive and expert representatives from the relevant SAGE sub-group to ensure our advice is up to date and as clear as possible. The feedback you have provided in your letter, along with that of other key stakeholders, will be taken into consideration as part of that process.

Our current guidance makes clear what actions local authorities should take to ensure an appropriate balance between good ventilation and user comfort.

It includes a requirement for all schools and ELC settings to have access to CO2 monitoring, whether fixed or mobile. It also asked local authorities to undertake initial monitoring of all learning, teaching and play spaces in Scottish schools with a view to identifying areas where remedial action was required, and set a challenging deadline of the October break to achieve this wherever possible.

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Local authorities were asked to have regard to our guidance when undertaking these assessments and conducting remedial work. That guidance refers to relevant regulations, including the [School Premises Regulations](#) and the [Workplace \(Health, Safety and Welfare\) Regulations 1992](#) requirements to maintain a reasonable temperature in the workplace. While minimum requirements vary depending on the specific part of the school estate, for classrooms the School Premises Regulations stipulate 2 air changes per hour and a temperature of 17°C.

Our guidance also sets out scientific advice on appropriate levels of CO2. CO2 levels below 800 parts per million (ppm) are usually indicative of well-ventilated spaces, while an upper limit of 1500 parts per million (ppm), if regularly sustained, could indicate a poorly ventilated space. The use of CO2 monitors provides information to allow users to take action as levels rise above 800ppm, in order to keep levels below 1500ppm.

Scottish Government guidance also sets out strategies to help improve ventilation and balance these with user warmth, and makes clear that local authorities should, in consultation with staff and trade unions, ensure there are clear plans in place for effective implementation of local strategies. That includes putting in place pragmatic, proportionate procedures to be followed in the event of any concerns around ventilation or heating.

Local authorities were supported throughout the process of initial CO2 monitoring by regular engagement with Scottish Government and Scottish Futures Trust officials, during which learning and good practice were shared between local authorities.

We further supported delivery of this commitment with an additional £10m funding for local authorities. A previous allocation of £90m Covid-19 logistics funding was also provided for uses including improved ventilation, and we are aware that some local authorities used their share of this funding for those purposes. This represents a significant investment in ensuring ventilation, along with other mitigations in schools, plays an effective role in reducing the risks of COVID.

Local authorities have reported that the initial monitoring exercise is now complete, with all learning, teaching and play spaces having received an initial assessment. This was an important step forward for our collective understanding of ventilation issues in the learning estate. Scotland is the first part of the UK to have achieved this in our local authority schools and settings, and I am grateful to local authorities and school staff, including NASUWT members, for the hard work that has gone into achieving this.

Local authorities rightly hold the detailed information on outcomes of assessments at local level. However, to ensure transparency, throughout the process local authorities were asked to provide us with high-level information on any ventilation mitigations or remedial action arising from the CO2 monitoring exercise.

I set out in a [letter](#) to the Scottish Parliament's Education, Children and Young People's Committee information about this initial monitoring exercise and the overall outcomes that local authorities have reported to us. Local authorities reported only limited instances of higher-than-expected levels of CO2, having regard to our guidance. They also reported that these issues have largely been capable of being addressed effectively with relatively simple measures, such as freeing stuck windows or additional guidance to staff. Inappropriately occupied spaces were also identified, and arrangements made to relocate to other spaces with appropriate levels of ventilation. In very occasional instances, additional fan systems have been required where no other ventilation was available, for example, where non-

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teaching spaces had been adapted to be used as sensory rooms.

This was, of course, an initial monitoring exercise, and we continue to work closely with local authorities to support them to develop strategies that are sustainable and effective on an ongoing basis.

As I have noted, our guidance makes clear the importance of balancing ventilation with user warmth. As we enter winter, we fully acknowledge that the challenge of doing so becomes more acute.

The primary effective method of increasing natural ventilation remains the opening of external doors, vents and windows. Wherever it is practical, safe and secure to do so, and appropriate internal temperatures can be maintained in line with statutory obligations, our guidance makes clear that this approach should be adopted.

I disagree, however, with your characterisation of the guidance on this issue as amounting to “open a window” or “wear more layers of clothing” – although both of these remain important and, in our view, reasonable strategies to adopt given that we remain in a global pandemic.

The guidance provides additional nuance around the approach to ensuring natural ventilation (partial opening of doors and windows, use of high-level windows to reduce draughts, purging spaces periodically), covers the use of mechanical ventilation (where present) and fan systems, and notes that local authority CO2 monitoring programmes can support decision-making around the best strategies to adopt in specific spaces, for example by assessing the extent to which window opening is required to maintain levels of CO2 that are consistent with good ventilation. All of this is fully in line with expert scientific and public health advice.

Finally, you note in your letter that you have had reports of monitors being installed inappropriately and widely differing interpretations of trigger points where any action is required. These issues should, of course, be raised in the first instance with schools and local authorities. In the event that any of your members have continuing concerns about implementation of the guidance in specific schools or local authorities, and these have not been adequately addressed at local authority level despite collective best efforts, I understand that COSLA officials have indicated they would be happy to receive these specific examples through the WIG process, and consider how to resolve any such issues.

Thank you for your continuing engagement on these important issues. Officials will continue to keep our guidance under review, and endeavour to keep your colleagues informed when updates are made.

I hope that this information is helpful.

Yours sincerely



**SHIRLEY-ANNE SOMERVILLE**

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