



Nadhim Zahawi MP
Secretary of State for Education
Sanctuary Buildings
Great Smith Street
London SW1P 3BT

11 November 2021

Dear Secretary of State

Thank you for your letter of 31 October in response to our letter of 17 September, both of which are attached.

We are concerned that your response does not adequately deal with the questions that were posed. For example, we asked why the DfE's guidance does not fully reflect HSE/SAGE guidance, but your response merely states that the DfE 'took account' of SAGE guidance. This does not answer the question, as 'taking account' is not the same as reflecting, and also ignores the reference to the HSE.

Your response also repeats the inconsistency in the DfE's guidance, in that it acknowledges that the various papers recommend keeping CO₂ levels below 800ppm, but then states that this is why the DfE advises that 'a consistent value over 800ppm should be seen as an early indicator to increase ventilation'. This is not consistent, because if the levels are above 800ppm, this is not an 'early indicator', but a clear sign that ventilation should be increased. 'Early indicator' suggests that nothing needs to be done, other than possibly monitoring the situation to see if the levels increase.

This inconsistency is repeated again with regard to levels being above 1,500ppm, with your response repeating the DfE's guidance that this is the level at which action is required. This has the effect of further implying that nothing needs to be done until the 1,500ppm threshold is reached, and does not answer the question regarding the level at which rooms should be taken out of use. CO₂ levels in excess of 1,500ppm are indicative of poor ventilation and, therefore, continuing to use such a room could place schools in breach of the Workplace (Health, Safety and Welfare) Regulations 1992.

With regard to air cleaning devices, your response states that the DfE is carefully considering the use of these. However, action is required now, not in six or eight months' time. We are aware that a trial of the use of air filtration is underway in Bradford, but few details have been provided of this, and we understand that the trial is not expected to report until mid-2022, which renders it largely pointless in terms of COVID-19.

You will be aware that the REACT-1 study has recently released a report showing that infection rates are at their highest ever levels, and that the high infection levels in schools are starting to bleed into other age groups, with rates doubling amongst the over-65s who are most at risk from the virus. This underlines the need for urgent action to be taken to strengthen mitigations in schools, as the current provisions are clearly not stemming the transmission of the virus. The Government cannot simply sit back and allow the virus to spread unchecked across schools. Multi-layered mitigations are required now.

In relation to the monitors, although your commitment to roll them out as quickly as possible is welcome, the fact that we are now into November and only around half have been delivered is troubling, and this roll out needs to be accelerated.

Your response makes reference to a ventilation document-sharing platform for schools, and it would be useful to have access to this, or to be provided with the documents contained within. In addition, the following points need to be addressed as a matter of urgency:

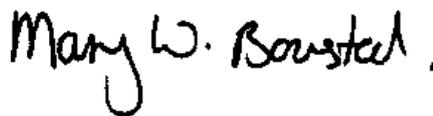
- a) the DfE's guidance needs to be clear that action should be taken to ensure that CO₂ levels do not exceed 800ppm in line with HSE guidance, because waiting for levels to hit 1,500ppm is unacceptable;
- b) where rooms are above 1,500ppm, urgent measures must be taken, which should include temporarily taking the room out of use while the situation is addressed, in line with the Workplace (Health, Safety & Welfare) Regulations; and
- c) concrete examples of the measures that could be taken by schools to improve ventilation should be included in the DfE's guidance, as is the case with the Welsh Government's guidance.

We look forward to your urgent response.

Yours sincerely



Joint NEU General Secretary



Joint NEU General Secretary



GMB National Officer



Unite National Officer

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UNISON Head of Education

Handwritten signature of the NASUWT General Secretary in black ink.

NASUWT General Secretary