

Schools coronavirus (COVID-19) 8 March Operational Guidance

On 22 February, the Government issued further coronavirus operational guidance for schools, post-16 providers, early years and further education (FE) colleges.

The Government guidance explains the actions that school and college leaders should take to minimise the risk of transmission of coronavirus (COVID-19) in their school/college.

The guidance also includes public health advice, endorsed by Public Health England (PHE).

This briefing should be read in conjunction with the Government guidance:

- [schools and post-16](#);
- [early years and childcare providers](#);
- [FE colleges and providers](#).

The Government has made clear that it also expects independent schools to follow the control measures set out in its guidance in the same way as state-funded schools.

It is vitally important to emphasise that the health and safety legislation underpins the Government guidance. Therefore, the starting point for any employer must be the health and safety legislation, and compliance with its statutory duties under each provision of the law.

Opening to all pupils from 8 March 2021

From 8 March 2021, all pupils are expected to return.

To facilitate this, schools/colleges **MUST**:

- review and update their risk assessments;
- ensure they are following the system of controls as advised by the Government (and in line with their health and safety obligations) to minimise the risk of infection, including to plan for asymptomatic testing;
- have a contingency plan in place for outbreaks in the school or changes in restrictions;
- communicate any changes in your processes to parents and staff.

Risk assessments

Schools and college employers have a legal duty to protect people from harm. This includes taking reasonable steps to protect staff, pupils and others from coronavirus (COVID-19) within the school/college.

Employers **MUST** do the following:

- implement reasonably practicable control measures which follow the health and safety hierarchy of controls to reduce the risk to the lowest reasonably practicable level;
- regularly review and update their risk assessments – treating them as ‘living documents’ – as the circumstances at the school/college and the public health advice changes. This is particularly relevant as schools/colleges admit more pupils from 8 March. This applies to individual as well as general risk assessments;
- have in place active arrangements to monitor that the controls are effective and are working as planned;
- notify staff and health and safety representatives of the outcomes of risk assessment reviews.

Schools must share the results of their risk assessment reviews with their workforce. In addition, the Government recommends that risk assessments should be published on the school/college website to provide transparency of approach to staff, parents, carers and pupils. (NB: The Health and Safety Executive (HSE) expects all employers with over 50 staff to do so.)

Employers should have in place systems to monitor and review the preventive and protective measures regularly, to ensure the measures are working, and take action to address any shortfalls, as well as a clear procedure for staff to raise concerns.

Schools are required to appoint staff members to assist in setting up and implementing the safe system in respect of coronavirus.

It is a legal requirement that employers must consult with staff and/or their representatives. Schools cannot decide who the representative will be.

Schools **MUST** comply with health and safety law and put in place all reasonably practicable control measures. To meet these obligations, schools are required to:

- review their health and safety risk assessments in light of the updated guidance;
- make any necessary changes to the control measures and ensure they apply the system of controls;
- share the updated risk assessments with all staff.

The coronavirus pandemic and the identification of new variants makes any pre-existing risk assessment invalid. Schools cannot rely on existing risk assessments that have not been thoroughly updated.

The NASUWT insists that all school/college employers must provide an updated risk assessment, and consult and publish the outcomes prior to reopening from 8 March.

Where concerns arise, these should be raised initially with line management and the NASUWT. Where concerns are not resolved, members should follow the advice on the NASUWT website: <https://www.nasuwt.org.uk/advice/health-safety/how-to-address-health-and-safety-concerns.html>. This may require referral to the Health and Safety Executive (HSE).

Where the HSE identifies employers who are not taking action to comply with the relevant public health legislation and guidance to control public health risks, they will consider taking a range of actions to improve control of workplace risks. The actions the HSE can take include the provision of specific advice to employers, through to issuing enforcement notices to help secure improvements.

System of controls

The Government Guidance confirms that schools/colleges **MUST** always:

1. minimise contact with individuals who are required to self-isolate by ensuring they do not attend the school;
2. ensure face coverings are used in 'recommended' circumstances. Recommended circumstances includes staff and pupils in classrooms and communal areas in secondary schools, and for staff in communal areas in primary schools unless two metre social distancing can be assured (see below);
3. ensure everyone is advised to clean their hands thoroughly and more often than usual;
4. ensure good respiratory hygiene for everyone by promoting the 'catch it, bin it, kill it' approach;
5. maintain enhanced cleaning, including cleaning frequently touched surfaces often, using standard products such as detergents. Note: Cleaning should only be undertaken by trained cleaning staff;
6. consider how to minimise contact across the site and maintain social distancing wherever possible;
7. keep occupied spaces well ventilated. The HSE states that carbon dioxide sensors can be useful in this regard;
8. ensure individuals wear the appropriate personal protective equipment (PPE) where necessary;
9. promote and engage in asymptomatic testing, where available;

10. promote and engage with the NHS Test and Trace process. This includes use of the NHS Test and Trace App;
11. manage and report confirmed cases of coronavirus (COVID-19) amongst the school community;
12. contain any outbreak by following local health protection team advice.

COVID-19 transmission

Anyone told to isolate by NHS Test and Trace or by their public health protection team has a legal obligation to self-isolate. You may only leave home to avoid injury or illness, or to escape risk of harm.

If anyone in the school develops a new and continuous cough or a high temperature, or has a loss of, or change in, their normal sense of taste or smell (anosmia), the school:

- must send them home to begin isolation – the isolation period includes the day the symptoms started and the next ten full days;
- advise them to follow the guidance for households with possible or confirmed coronavirus (COVID-19) infection;
- advise them to arrange to have a Polymerase Chain Reaction (PCR) test as soon as possible to see if they have coronavirus;
- government guidance also states that no pupil should be denied education on the grounds that they are not wearing a face covering.

If anyone tests positive whilst not experiencing symptoms, but develop symptoms during the isolation period, they must restart the ten-day isolation period from the day they developed symptoms.

Any member of staff who has provided close contact care to someone with symptoms, regardless of whether they are wearing PPE, and all other members of staff or pupils who have been in close contact with that person, do not need to go home to self-isolate unless:

- the symptomatic person subsequently tests positive;
- they develop symptoms themselves (in which case, they should self-isolate immediately and arrange to have a test);
- they are requested to do so by NHS Test and Trace or the PHE advice service (or the PHE local health protection team if escalated);
- they have tested positive from a lateral flow device (LFD) test as part of a community or worker programme.

Schools must strictly adhere to the Guidance published by the Government when responding to any cases of infection.

Face coverings

These measures will be in place until Easter and will be kept under review by the Government.

Secondary schools and post-16

- Face coverings should be worn by adults and pupils when moving around the premises outside of classrooms, such as in corridors and communal areas, where social distancing cannot easily be maintained.
- Face coverings do not need to be worn by pupils when outdoors on the premises.
- Face coverings should be worn in classrooms or during activities unless social distancing can be maintained (except where wearing a face covering would impact on the ability to take part in exercise or strenuous activity, e.g. PE lessons).

Schools must make expectations clear to pupils and have clear procedures to deal with non-compliance.

The wearing of masks in classrooms is not optional where two metre distancing cannot be maintained, and schools will need to consider very carefully procedures where parents request dispensation for their children not to wear a mask.

Primary schools

- Face coverings should be worn by staff and adult visitors in situations where social distancing between adults is not possible (for example, when moving around in corridors and communal areas).
- Children in primary school not required to wear face coverings are not prohibited from doing so.

Primary schools should consider the use of face masks in classrooms by taking into account the physical environment, ventilation and scope to maintain adequate social distancing.

There is nothing in the Guidance which prohibits schools from requesting that pupils wear face masks.

Transparent face coverings

- Transparent face coverings may assist communication with someone who relies on lip reading, clear sound or facial expression to communicate. Those who rely on visual signals for communication, or communicate with or provide support to such individuals, are currently exempt from any requirement to wear face coverings in schools or in public places. Following an effective risk assessment, it may also be possible to support engagement with deaf learners in one-to-one contexts through the use of transparent protective screens.
- Schools should use the period before full opening to audit their requirements for transparent masks and screens and to ensure that adequate supplies are available.
- The Government and PHE advise that face visors or shields should not be worn as an alternative to face coverings, as they are unlikely to be effective in reducing aerosol transmission when used without an additional face covering. They should only be used after carrying out a risk assessment for the specific situation and should always be cleaned appropriately.

Access to face coverings

Schools should have a contingency supply of face coverings available for people who:

- are struggling to access a face covering;
- are unable to use their face covering as it has become damp, soiled or unsafe;
- have forgotten their face covering. The guidance states that no pupil should be denied education on the grounds that they are not wearing a face covering.

Cleaning

In line with the risk assessment and timetabling of the day, schools must put in place and maintain an enhanced cleaning schedule. This should include:

- more frequent cleaning of rooms or shared areas that are used by different groups;
- frequently touched surfaces being cleaned more often than normal;
- cleaning toilets regularly;
- encouraging pupils to wash their hands thoroughly after using the toilet;
- if the site allows, allocating different groups their own toilet blocks.

Public Health England has published guidance on [cleaning of non-healthcare settings](#). This contains advice on the general cleaning required, in addition to the existing advice on cleaning when there is a suspected case.

Cleaning should only be undertaken by trained cleaning staff. It is not appropriate, and potentially in breach of health and safety legislation, for non-trained staff to undertake cleaning duties.

Teachers cannot be required to undertake cleaning duties unless specifically stated in their contract.

Minimising contact and maintaining social distancing

Schools **MUST** do everything possible to minimise contacts and mixing while delivering a broad and balanced curriculum.

The overarching principle that should be applied is reducing the number of contacts between pupils and staff.

Schools should seek to keep groups separate (in ‘bubbles’) and through maintaining distance between individuals.

Ensuring consistent pupil groupings should help to reduce the risk of transmission by limiting the number of pupils and staff in contact with each other to only those within the group.

All teachers and other staff can operate across different classes and year groups to facilitate the delivery of the timetable and specialist provision. Where staff need to move between groups, they should try and keep their distance from pupils and other staff as much as they can, ideally two metres from other adults.

Teachers should only move between groups for the purposes of facilitating education, and not for other means, such as conducting observations.

Further advice and guidance on lesson observations and COVID-control measures is available on the NASUWT website at: <https://www.nasuwt.org.uk/advice/health-safety/coronavirus-guidance/full-reopening-of-schools/full-reopening-of-schools-england/lesson-observations-and-covid-19-england.html>.

Measures within the classroom

Maintaining a distance between people while inside and reducing the amount of time they are in face-to-face contact lowers the risk of transmission.

Advice from public health is that staff in secondary schools should maintain distance from pupils, staying at the front of the class, and away from their colleagues where possible.

Teachers should not be expected to circulate around their room, and appropriate measures should be in place for teachers to give individual feedback that does not require them to get within two metres of pupils.

Adults should seek to maintain two metre distance from each other and from children.

Pupils should be encouraged to maintain distance and not touch staff and their peers.

When staff and pupils cannot maintain distancing, the Government recommends the use of smaller, class-sized groups.

In addition, schools are also expected to consider:

- seating pupils side by side and facing forwards, rather than face-to-face or side on;
- moving unnecessary furniture out of the classroom to make more space;
- the avoidance of large gatherings such as assemblies or collective worship with more than one group;
- when timetabling, groups should be kept apart and movement around the school kept to a minimum;
- staggered break times and lunch times;
- minimising the use of staff rooms, although staff must still have a break of a reasonable length during the day;
- staggered start and finish times at the beginning and end of the school day to keep groups apart as they arrive and leave;
- reminding parents/carers of the process that has been agreed for drop-off times and collection of pupils and that they should not gather at the gates or come onto the site without an appointment.

Travelling to the setting

Where pupils and staff need to use public transport, they should follow the [safer travel guidance for passengers](#).

Schools should provide copies of risk assessments undertaken by dedicated school travel providers.

Ventilation

Good ventilation reduces the concentration of the virus in the air, which reduces the risk from airborne transmission. Schools must ensure that classrooms and work areas are well ventilated and provide a comfortable teaching environment at all times.

The NASUWT advice on ventilation is available at: <https://www.nasuwt.org.uk/advice/health-safety/coronavirus-guidance/full-reopening-of-schools/ventilation-and-covid-19.html>.

Testing of pupils and staff

Schools should follow the guidance set out for their settings:

- [Rapid asymptomatic coronavirus \(COVID-19\) testing for staff in primary schools, school-based nurseries and maintained nursery schools – GOV.UK \(www.gov.uk\)](#);
- [Coronavirus \(COVID-19\) asymptomatic testing in schools and colleges – GOV.UK \(www.gov.uk\)](#);
- [Rapid asymptomatic testing in specialist settings - GOV.UK \(www.gov.uk\)](#).

Staff members, parents and carers **MUST**:

- book a test if they or their child has COVID symptoms – the main symptoms are a high temperature, a new continuous cough, and a loss or change to your sense of smell or taste;
- self-isolate immediately and not come to school if they develop symptoms or if they have been in close contact with someone who tests positive for coronavirus (COVID-19);
- self-isolate if anyone in their household or support or childcare bubble develops symptoms of coronavirus (COVID-19);
- self-isolate if they are required to do so having recently travelled from certain other countries;
- self-isolate if they have been advised to do so by NHS Test and Trace or the PHE local health protection team, as a legal obligation;
- provide details of anyone they have been in close contact with if they test positive for coronavirus (COVID-19) or if asked by NHS Test and Trace.

The NHS COVID-19 app

The app is available to anyone aged 16 and over to download if they choose.

The Government advice is clear that all staff are also able to use the NHS app.

Coronavirus (COVID-19) asymptomatic testing in schools

Rapid-testing using LFDs are provided to support the return to face-to-face education.

Staff and pupils are asked to share their test results, whether void, positive or negative, with their school to help with contact tracing.

The use of LFD tests is encouraged. However, it cannot be overstated that LFD tests must be in addition to all other controls.

Other controls must NOT be reduced because of LFD testing being employed.

Testing in secondary schools

- Staff in secondary schools will continue to be provided with LFDs for use twice a week at home.
- Secondary schools are being asked to offer pupils testing at an on-site asymptomatic testing site (ATS) before 12 March.
- Testing and return of pupils in secondary schools can be phased during the first week to manage the number of pupils passing through the test site at any one time.

- Schools should offer three onsite tests to pupils, three to five days apart.
- Schools have the flexibility to consider how best to deliver testing on a phased basis by 12 March, depending on their circumstances and local arrangements, but schools should prioritise vulnerable children and children of critical workers, and year groups 10 to 13.
- Pupils should return to face-to-face education following their first negative test result.
- Pupils not undergoing testing should attend school in line with the school's phased return arrangements, but schools should ensure, as far as reasonably practicable, that pupils who have not yet had their first negative test are kept apart to ensure that asymptomatic infected pupils do not spread the virus to others.
- Teachers are not expected to administer tests to pupils.
- Staff or pupils with a positive LFD test result will need to immediately self-isolate, along with their household members, in line with the Government's stay-at-home guidance.
- They will also need to arrange a lab-based PCR test to confirm the result if the test was done at home. If the PCR test is negative, they can cease self-isolation. Those with a negative LFD test result can continue to attend school and use protective measures.

Primary schools

- Staff in primary schools will continue to be provided with LFDs for use twice a week at home.
- Staff with a positive LFD test result will need to immediately self-isolate, along with their household members, in line with the Government's stay-at-home guidance. They will also need to arrange a lab-based PCR test to confirm the result if the test was done at home. If the PCR test is negative, they can cease self-isolation. Those with a negative LFD test result can continue to attend school and use protective measures.
- Primary age pupils will not be tested with LFDs.
- All primary school pupils are expected to return to school on 8 March.

Specialist settings

- Staff in specialist settings will continue to be provided with LFDs for use twice a week at home.
- No child or young person will be tested unless informed consent has been given by the appropriate person.

Asymptomatic testing

- The asymptomatic testing programme does not replace the current testing policy for those with symptoms.
- Anyone with symptoms (even if they recently had a negative LFD test result) should still self-isolate immediately, according to Government guidelines.
- Those with symptoms are also expected to order a test online or visit a test site to take a lab-based PCR test to check if they have the virus.

Staff who are clinically extremely vulnerable (CEV)

CEV staff should not attend the workplace.

Staff who are CEV will have received a letter from the NHS or their GP telling them this (no new letter is required), and there is guidance for everyone in this group.

Employers are expected to discuss with their CEV staff how they will be supported, including how to work from home.

Schools **MUST** continue to pay CEV staff on their usual terms.

The Government advises that those living in a household with someone who is CEV can still attend work where home working is not possible.

CEV individuals (over 18) have been prioritised for vaccination in phase 1 before the general population and in line with the priority ordering set by the Joint Committee on Vaccination and Immunisation.

CEV individuals should continue to shield even after they have been vaccinated.

Staff who are clinically vulnerable

Clinically vulnerable staff are advised by the Government that they can continue to attend the workplace.

Clinically vulnerable staff will require an updated individual risk assessment which is shared before they are expected to return to the workplace. Clinically vulnerable staff should also ensure that any additional advice they have received from medical practitioners on managing COVID-related risks are incorporated into their individual risk assessments. The employer would also need to consider potential discrimination issues and other risks, if it is proposing to follow the Government guidance, as the ultimate responsibility for decisions on the safety and wellbeing of employees rests with the employer.

Pregnancy

Schools **MUST** follow the specific [advice for pregnant employees](#).

In some cases, pregnant women may also have other health conditions that mean they are considered CEV, where the advice for CEV staff will apply.

Where the employer has been notified that an employee is pregnant, breastfeeding, or has given birth within the last six months, they must ensure that they check the workplace risk assessment to see if any new risks have arisen.

Any risks identified at that point, or later during the pregnancy, in the first six months after birth, or while the employee is still breastfeeding, must be included and managed as part of the general workplace risk assessment.

Schools **MUST** take appropriate action to reduce, remove or control the risks.

Employers have additional duties under the law to protect the health and safety of new and expectant mothers in the workplace. In summary, the law requires employers:

- to assess the workplace risks posed to new or expectant mothers or their babies;
- to alter the employee's working conditions or hours of work to avoid any significant risks.

Where it is not reasonable to alter working conditions or hours, or if this would not avoid the risks, suitable alternative work should be offered on terms that are not 'substantially less favourable'.

Where suitable alternative work is not available, or the employee reasonably refuses it, to suspend the employee on full pay.

The Equality and Human Rights Commission (EHRC) guidance further suggests that requiring pregnant employees to continue to work in front line roles could amount to indirect discrimination.

Advice from the Royal College of Obstetricians and Gynecologists (RCOG) states that women from Black, Asian and minority ethnic (BAME) backgrounds are at higher risk of becoming seriously unwell and being admitted to hospital if they contract COVID-19. Also, women aged 35 and over, and those with a BMI above 25 or more, are also at a higher risk of developing severe illness.

Women within these higher risk categories should ensure that these greater risks are addressed within their individual risk assessments.

Pregnant women from 28 weeks' gestation, or with underlying health conditions at any point of gestation, may be at greater risk of severe illness if they catch coronavirus. This is also the case for pregnant women with underlying health conditions that place them at greater risk of severe illness if they catch coronavirus.

As part of the school's risk assessment, employers should consider whether adapting duties and/or facilitating home working may be appropriate to mitigate risks.

Further guidance on [coronavirus infection and pregnancy \(rcog.org.uk\)](#) is also recommended by the Government.

Equalities duties

Schools **MUST** continue to meet their equalities duties, including their 'due regard' to equality considerations of decisions that impact on pupils and staff.

Schools are required under Public Sector Equality Duty to identify and take appropriate steps to address any discriminatory and adverse impacts of their policies and practices. This will include their arrangements for ensuring the COVID safety of all staff and pupils.

There is substantial evidence that BAME groups are disproportionately more likely to be impacted by COVID-19 infections and deaths.

This group, along with older workers, pregnant women and disabled staff at higher risk, are protected by the Equality Act 2010.

Schools should therefore factor inequality impacts as part of their plans and arrangements for the wider reopening of schools.

The Government advice for schools on the [Equality Act 2010](#) explains the duties that apply to school/college employers.

Supporting staff

All employers have a duty of care to their employees, and this extends to their mental health.

Schools **MUST**:

- make sure they have explained to all staff the measures they are putting in place;
- discuss with all staff any changes in place as part of these measures;
- consider putting into place extra systems to support staff wellbeing.

The Government has provided further advice to schools on staff deployment, including:

- a workload reduction toolkit to help review and minimise unnecessary burdens;
- the Education Endowment Foundation (EEF) guidance on making the best use of teaching assistants.

The NASUWT workload advice is available at: <https://www.nasuwt.org.uk/advice/health-safety/coronavirus-guidance/full-reopening-of-schools/workload-wellbeing-and-covid-19.html>.

A COVID-19 workload checklist is available at: <https://www.nasuwt.org.uk/uploads/assets/uploaded/492fb047-20ae-4a51-86448149964636ea.pdf>.

The Union has also provided specific advice and guidance on wellbeing which can be accessed at: <https://www.nasuwt.org.uk/advice/health-safety/coronavirus-guidance/take-control-of-your-wellbeing-during-covid-19.html>.

Supply staff and other temporary or peripatetic staff

Schools can continue to use supply teachers and staff.

Supply staff and other temporary or peripatetic staff can move between schools.

Supply staff must be given access to information on the safety arrangements and be provided with this as soon as possible after any booking.

Further NASUWT guidance for supply teachers can be found at: <https://www.nasuwt.org.uk/advice/supply-teacher.html>.

Deployment of ITT trainees

ITT trainees can continue to go into their host school or college on placement, and must be provided with the risk assessment for their placement. In some circumstances, such as where the ITT trainee is clinically vulnerable, an individual risk assessment will also be required.

Trainees who go to their placement should be offered coronavirus (COVID-19) testing in the same way other school staff are.

Performance management and appraisal

Maintained schools must continue to follow the School Teachers' Pay and Conditions Document.

Schools should adapt performance management and appraisal arrangements to take account of the current circumstances, particularly where these have had an impact on the ability of the teacher to meet fully their objectives.

Teachers **MUST** not be penalised during the appraisal process or any subsequent pay progression decisions because of the decision to restrict pupil attendance at schools.

The provisions permitting teachers to move between groups of pupils do not extend to carrying out observations and monitoring of teachers, and this should not occur.

Staff taking leave

Schools have been asked to discuss leave arrangements with staff to inform workforce planning, taking into account their individual contractual arrangements.

There is a risk that where staff travel abroad for a legally permitted reason, their return travel arrangements could be disrupted due to coronavirus restrictions and they may need to quarantine on their return.

Guidance is also available on [how to self-isolate if you arrived in England before 15 February 2021](#).

Curriculum

Schools should ensure that all pupils – particularly disadvantaged, special educational needs and disabilities (SEND) and vulnerable pupils – are given the support needed to make good progress.

The Government advice is that:

- education is not optional;
- all pupils must receive a high-quality education;
- the curriculum must remain broad and ambitious;
- all pupils continue to be taught a wide range of subjects, maintaining their choices for further study and employment.

Examinations

GCSE, A and AS-level exams will not go ahead this Summer.

The Government advises that students taking GCSE, AS and A-levels, will receive grades based on teacher assessment, with teachers supported to reach their judgements by guidance and training from the exam boards.

Further advice on the arrangements for qualifications and awards in 2021 will be published separately.

Inspection

Routine, graded Ofsted inspections remain suspended for the Spring term. It is intended that these inspections will resume in the Summer term. We are continuing to keep the inspection arrangements under review.

NASUWT advice and guidance on Ofsted's current programme of monitoring inspections of schools is available here: <https://www.nasuwat.org.uk/advice/in-the-classroom/inspection-and-accountability/inspection-in-england/ofsted-inspection.html>.

Contingency planning

In circumstances where individuals or groups of pupils are self-isolating or shielding, remote education plans should be in place.

In the event that restrictions in schools are needed to help contain the spread of the virus, schools may be asked to revise their delivery models for a short period of time.

The Government's [contingency framework for education and childcare settings](#) has been updated and outlines how schools should operate in the event of any restrictions.

Any decision that there should be local restrictions in any childcare or education setting will be made by central government on a case-by-case basis.

Further information and advice for members is available at: **NASUWT | Coronavirus Hub.**