



An Roinn Oideachais  
Department of Education

# Cloughjordan No.1 N.S. COVID-19 Response Plan for the safe and sustainable operation of Primary and Special Schools

(Changes from V3 highlighted in red)

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This is a living document and may be reviewed and amended to take into account new guidance from [www.Gov.ie](http://www.Gov.ie), [www.dbei.ie](http://www.dbei.ie), [www.hse.ie](http://www.hse.ie), [www.hpsc.ie](http://www.hpsc.ie), [www.hsa.ie](http://www.hsa.ie); [www.education.ie](http://www.education.ie) or agreements with education partners as appropriate for primary and special schools.

## **Appendices**

- Appendix 1**      Template COVID-19 School Policy Statement
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## 1) **Introduction**

In accordance with the Work Safety Protocol each workplace is required to have a COVID-19 Response Plan. In addition to being places of learning, schools are also places of work.

The purpose of this document is to provide clear and helpful guidance for the safe operation through the prevention, early detection and control of COVID-19 in primary and special schools. It provides key messages to minimise the risk of COVID-19 for staff, pupils, families and the wider community while recognising the importance of education for the health and wellbeing of pupils and society as a whole.

This document focuses on the practical steps which can be taken in primary and special schools to minimise the risk of the introduction of infection into schools while recognising that no interpersonal activity is without risk of transmission of infection at any time. The documentation and templates in this booklet are supported by the public health advice provided by the Health Protection Surveillance Centre (HPSC) for the safe reopening of schools and educational facilities. That report is available [here](#).

One of the key challenges is to balance the need for a practical and sensible level of caution with the need to provide a supportive environment for teaching and learning. This document identifies the steps schools can take to do everything practical to avoid the introduction of COVID-19 into the school and the steps that can be taken to reduce the likelihood of the spread within the school itself.

The Department has worked intensively with the education partners to develop consistent plans, advice, protocols and guidance for schools, including the School COVID-19 Response plan. There is a suite of documentation available to support schools to continue to operate safely and fully including guidance on learning, school programmes and wellbeing for the 2021/22 school year. There is also information on funding, staffing and resources to schools to support COVID-19 measures. Schools are advised to familiarise themselves with these documents. All of the documents will be available at [gov.ie/backtoschool](http://gov.ie/backtoschool)

## **2) What is a COVID-19 Response Plan?**

A COVID-19 Response Plan is designed to support the staff and Board of Management (BOM)/Education Training Board (ETB) in putting measures in place that aim to prevent the spread of Covid-19 in the school environment.

The COVID-19 Response Plan details the policies and practices necessary for a school to meet the Government's '*Work Safely Protocol*', to prevent the introduction and spread of Covid-19 in the school environment.

It is important that school-based teaching and learning and the operation of school facilities complies with the public health advice and guidance documents prepared by the Department. Doing so minimises the risk to pupils, staff and others. The response plan supports the sustainable operation of schools where the overriding objective is to protect the health of staff and pupils while promoting the educational and development needs of the pupils in the school. The COVID-19 response plan is a living document and will be updated in line with the public health advice as appropriate for primary and special schools.

In line with the Work Safely Protocol, the key to maintaining a safe school requires strong communication and a shared collaborative approach between the BOM/ETB, staff, pupils and parents.

The assistance and cooperation of all staff, pupils, parents, contractors and visitors is critical to the continued success of the plan.

*Every effort is made to ensure the accuracy of the information provided in this document. However, should errors or omissions be identified, please notify us so that appropriate measures can be taken to rectify same.*

## **3) School COVID-19 Policy**

A COVID-19 policy outlines the ongoing commitment of the school to implementing the plan and help prevent the introduction and spread of the virus. The revised updated policy will be signed and dated by the chairperson and principal of the BOM/ETB and brought to the attention of the staff, pupils, parents and others. A template of a School COVID-19 policy can be found at **Appendix 1**.

## **4) Reviewing the safe operation of schools**

The BOM/ETB aims to facilitate the continuation of school based teaching and learning and a safe working environment for staff. The operation of schools must be done safely and in strict adherence to the public health advice and any guidance issued by the Department of Education.

Details for the safe operation of a school facility and the applicable controls are outlined in this document. Each school will need to review their current processes to ensure that they include the following:

- Arrangements to keep up to date with public health advice, changes to and Department of Education updates;
- Arrangements to pass on this information in a timely manner to staff, pupils, parents and others as required;
- Ensured that staff have reviewed the training materials provided by the Department of Education (**details at Section 4.1**);
- Provided staff with access to the Return to Work (RTW) form (**details at Section 4.2**);
- Identified a Lead Worker representative (**details at Section 4.3**);
- Displayed posters and other signage to prevent introduction and spread of COVID-19 (**details at Section 4.4**);
- Made the necessary changes to the school or classroom layout if necessary to support the redesign of classrooms to support physical distancing (**details at Section 4.5**);
- Removed unnecessary clutter to facilitate ongoing cleaning of the school taking into account the importance of having educational materials to create a stimulating learning environment;
- Updated the health and safety risk assessment (**details at Section 4.6**);
- Made necessary arrangements to limit access to the school to necessary visitors and maintain records of contacts to the school (**details at 4.7**);
- Reviewed the school buildings to check the following after any period of closure:
  - Does the water system need flushing at outlets following low usage to prevent Legionella disease;
  - Has school equipment and mechanical ventilation been checked for signs of deterioration or damage before being used again;
  - Have bin collections and other essential services resumed.

There are checklists in place to assist schools on the details of what is needed for these arrangements in the Appendices of this plan.

#### **4.1) Induction Training (to be completed by new staff)**

All new staff will undertake and complete Covid-19 Induction Training prior to returning to the school building. The aim of such training is to ensure that staff have full knowledge and understanding of the following:

- Latest up to-date advice and guidance on public health;
- Covid-19 symptoms;
- What to do if a staff member or pupil develops symptoms of Covid-19 while at school;
- Outline of the Covid-19 response plan.

Staff will be kept fully informed of the control measures in place in the school and their duties and responsibilities in preventing the spread of Covid-19 and will be updated with any changes to the control measures or guidance available from the public health authorities.

If a staff member is unsure about any aspect of the COVID-19 Response Plan, the associated control measures, or his/her duties, he/she should immediately seek guidance from the Principal, who is supported in this role by the BOM/ETB

#### **4.2) Procedure for Returning to Work (RTW)**

In order to return to the workplace, staff must complete a **Return to Work (RTW)** form, which is available online or from the principal. A copy is attached also at **Appendix 2**.

A RTW form should be completed and returned to the school before returning to work. Schools should request staff to confirm that the details in the Return to Work Form remain unchanged following subsequent periods of closure such as school holidays.

The principal will also provide details of the **Induction Training** for completion by new staff and details of any additional health and safety measures in place in the school to facilitate the staff member's return to the school facility.

Details of the working arrangements that apply to the very high risk school staff, is in accordance with those applying for the public service generally, and is detailed in the relevant Department of Education circulars available on the Department's website.

#### **4.3) Lead Worker Representative**

The Protocol provides for the appointment of a Lead Worker Representative (LWR) in each workplace. The LWR will work in collaboration with the employer to assist in the implementation of measures to prevent the spread of COVID -19 and monitor adherence to those measures and to be involved in communicating the health advice around COVID-19 in the workplace.

This section sets out how the provisions will operate in schools. The process for appointment of the lead worker representative in schools has been agreed centrally between the Department of Education and the education partners.

Responsibility for the development, updating and implementation of the COVID-19 Response Plan and the associated control measures lies primarily with the Board of Management/ Education and Training Board and school management.

Strong communication and a shared collaborative approach is key to protecting against the spread of COVID-19 in schools, and looking after the health, safety and wellbeing of staff and pupils. Adherence to the Work Safely Protocol will only be achieved if everyone has a shared responsibility in implementing the measures contained within the Protocol in their place of work.

If a staff member has any concerns or observations in relation to the COVID-19 Response Plan, control measures or the adherence to such measures by staff, pupils or others he/she should contact the lead worker(s) who will engage with the principal/BOM.

## Role of the Lead Worker Representative

In summary, the role of the LWR is to:

- Represent all staff in the workplace regardless of role, and be aware of specific issues that may arise in respect of different staff cohorts;
- Work collaboratively with school management to ensure, so far as is reasonably practicable, the safety, health and welfare of employees in relation to COVID-19;
- Keep up to date with the latest COVID-19 public health advice;
- In conjunction with school management, promote good hygiene practices such as washing hands regularly and maintaining good respiratory etiquette along with maintaining social distancing in accordance with public health advice;
- Assist school management with implementing infection prevention control measures to suppress COVID-19 in the workplace in line with the Work Safely Protocol and current public health advice;
- In conjunction with school management, monitor adherence to measures put in place to prevent the spread of COVID-19;
- Conduct regular reviews of safety measures;
- Report any issues of concern immediately to school management and keep records of such issues and actions taken to rectify them;
- Consult with the school management on the school's COVID-19 Response Plan in the event of someone developing COVID-19 while in school including the location of an isolation area and a safe route to that area;
- Following any incident, assess with the school management any follow up action that is required;
- Consult with colleagues on matters relating to COVID-19 in the workplace;
- Make representations to school management on behalf of their colleagues on matters relating to COVID-19 in the workplace.

Every school will appoint one Lead Worker Representative

In schools with less than 30 staff, a Deputy Lead Worker Representative will be appointed in addition to the LWR. The role of the Deputy LWR will be to deputise as LWR where the LWR is absent.

In schools with 30 or more staff and in all Special schools, an Assistant Lead Worker Representative will be appointed in addition to the LWR. The role of the Assistant LWR will be to:

- assist the LWR in their duties as set out above; and
- deputise as LWR where the LWR is absent

<b>Name(s) of lead worker representative:</b>	<b>Contact details:</b>
<i>Louise Cromer (Lead Worker Representative)</i>	<i>0505 - 42318</i>
<i>Niall Farrell (Deputy Lead Worker Representative)</i>	<i>0505 - 42318</i>



All staff, pupils, parents, contractors and visitors have a responsibility both as individuals and collectively to have due regard for their own health and safety and that of others and to assist with the implementation of the COVID-19 Response Plan and associated infection prevention control measures.

Full details of the arrangements which will apply for the LWR in primary and special schools is set out at **Appendix 3**.

#### **4.4) Signage**

Schools are required to display signage outlining the signs and symptoms of COVID-19 and to support good hand and respiratory hygiene.

Please see link below to these posters. Any such supply can be sourced locally.

<https://www.education.ie/en/The-Department/Announcements/information-for-schools-preschools-and-third-level-institutions-on-the-coronavirus.html#1>

Schools can arrange to display the posters in prominent areas such as offices, corridors, staffroom area, classrooms and toilets.

#### **4.5) Making Changes to School Layout**

Maintaining physical distancing in the school environment is recommended as one of the key infection prevention control measures to minimise the risk of the introduction and spread of COVID-19. Information on how physical distancing can be used in the school environment is found at **Section 5.4** below including a link to the suite of illustrative primary classroom layouts (including special classes).

Schools can reconfigure classrooms and other areas as necessary to support physical distancing in line with the guidance.

#### **4.6) Health and Safety Risk Assessment**

COVID-19 represents a hazard in the context of health and safety in the school environment. A template risk assessment to identify the control measures required to mitigate the risk of COVID-19 in school settings is attached at **Appendix 4**.

It is important that schools review their emergency procedures involving, fire safety, first aid, accidents and dangerous occurrences to consider any new risks that arise due to the school's COVID-19 Response Plan. Any changes to the school's existing emergency procedures should be documented and incorporated into the school's safety statement.

Schools should also review their existing risk assessments to consider any new risks that arise due to the school's COVID-19 Response Plan. Any changes to the school's current risk assessments should also be documented and incorporated into the school safety statement.

## **First Aid/Emergency Procedure**

The standard First Aid/emergency procedure shall continue to apply in schools. In an emergency or in case of a serious incident, schools should call for an ambulance or the fire brigade on 112/999 giving details of location and type of medical incident.

### **4.7) Access to School and Contact Log**

Access to the school building will be in line with agreed school procedures.

Arrangements for necessary visitors such as contractors and parents will be restricted to essential purposes and limited to those who have obtained prior approval from the principal. The Department of Education Inspectorate may also need to visit schools and centres for education to support them as appropriate in the implementation of public health advice relating to creating a safe learning and working environment for all.

The prompt identification and isolation of potentially infectious individuals is a crucial step in restricting the spread of the virus and protecting the health and safety of the individuals themselves and other staff, contractors and visitors at the workplace. A detailed sign in/sign out log of those entering the school facilities should be maintained. The school should maintain a log of staff and pupil contacts. A sample contact log is available at **Appendix 5**.

The Data Protection Commission has provided guidance on the data protection implications of the return to work protocols. This advice can be found here:

<https://www.dataprotection.ie/sites/default/files/uploads/2020-07/Data%20Protection%20implications%20of%20the%20Return%20to%20Work%20Safely%20Protocol.pdf>

Schools are reminded that all school records and data must be maintained and processed in compliance with the GDPR and the Data Protection Acts. The responsibility for compliance with the legislation rests with each school (or ETB) in their role as data controller.

## **5) Infection Prevention Control Measures - To prevent Introduction and Spread of COVID-19 in Schools**

One of the key messages to manage the risks of COVID-19 is to do everything practical to avoid the introduction of COVID-19 into the school. If infection is not introduced it cannot be spread. The risk of spreading the infection once introduced exists in all interpersonal interactions; pupil-pupil, teacher-teacher and teacher- pupil and must be managed in all settings.

A range of essential control measures have been implemented to reduce the risk of the spread of Covid-19 virus and to protect the safety, health and welfare of staff, pupils, parents and visitors as far as possible within the school. The control measures shall continue to be reviewed and updated as required on an ongoing basis.

It is critical that staff, pupils, parents and visitors are aware of, and adhere to, the control measures outlined and that they fully cooperate with all health and safety requirements.

**The best ways to prevent the spread of COVID-19 in a workplace or any setting is to practice physical distancing, adopt proper hand hygiene, follow respiratory etiquette and increase ventilation.**

*Staff should note that they have a legal obligation under Section 13 of the Safety, Health and Welfare at Work Act 2005 to comply with health and safety requirements and to take reasonable care for the health and safety of themselves, their colleagues and other parties within the workplace.*

### **How to Minimise the Risk of Introduction of COVID-19 into Schools:**

Promote awareness of COVID-19 symptoms (**details at Section 5.1**);

- Advise staff and pupils that have symptoms not to attend school, to phone their doctor and to follow HSE guidance on self-isolation;
- Advise staff and pupils to self-isolate or restrict their movements at home if they display any signs or symptoms of COVID-19 and contact their family doctor to arrange a test
- **Advise staff and pupils, to follow the HSE advice if they are a close contact of a suspected/ confirmed case of Covid-19.**
- If they have travelled outside of Ireland; in such instances staff and pupils are advised to consult and follow latest Government advices in relation to foreign travel.
- Advise staff and pupils that develop symptoms at school to bring this to the attention of the Principal promptly;
- Ensure that staff and pupils know the protocol for managing a suspected case of COVID-19 in school (**details at Section 8**);
- Advise staff and pupils to cooperate with any public health officials and the school for contact tracing purposes and follow any public health advice in the event of a case or outbreak in the school;
- Everyone entering the school building needs to perform hand hygiene with a hand sanitiser;
- Visitors to the school during the day should be by prior arrangement and should be received at a specific contact point;
- Physical distancing (of 2m) should be maintained between staff and visitors where possible.

## 5.1) Know the Symptoms of COVID-19

In order to prevent the spread of COVID-19 it is important to know and recognise the symptoms of coronavirus (which includes the DELTA variant).

Common symptoms of coronavirus include:

- a fever (high temperature - 38 degrees Celsius or above).
- a new cough - this can be any kind of cough, not just dry.
- shortness of breath or breathing difficulties.
- loss or change in your sense of smell or taste – this means you've noticed you cannot smell or taste anything, or things smell or taste different to normal
- Fatigue
- Aches and Pains

Other uncommon symptoms of coronavirus include:

- sore throat
- headaches
- runny or stuffy noses
- feeling sick or vomiting
- diarrhoea

Infection with the virus that causes COVID-19 can cause illness, ranging from mild to severe, and, in some cases, can be fatal. It can take up to 14 days for symptoms to show. They can be similar to symptoms of cold and flu.

If you have any symptoms of COVID-19 (coronavirus), self-isolate (stay in your room) and phone your family doctor straight away to see if you need a free COVID-19 test.

Getting an early diagnosis means, you can get the help you need and take steps to avoid spreading the virus, if you have it.

For the complete list of symptoms, please refer to the HSE Website. Symptoms may be subject to change so regular review of the HSE Website is advised. **If you do not have symptoms, you can get a free COVID-19 (coronavirus) test at a COVID-19 walk-in test centre.**

### **COVID-19 Tracker App**

COVID Tracker app is a free and easy-to-use mobile phone app that will:

- alert you if you have been in close contact with someone who has tested positive for COVID-19 (coronavirus)
- keep other app users safe by alerting them if you test positive for COVID-19
- give you advice on what to do if you have symptoms

You can download the free app from [Apple's AppStore](#) or the [GooglePlay store](#)

**Employers and workers must keep themselves up to date on Public Health information as this can be updated on a regular basis.** Public Health information on close contacts, casual contacts and testing is available from the HSE website.

## **5.2) Respiratory Hygiene**

Make sure you, and the people around you, follow good respiratory hygiene. This means covering your mouth and nose with a tissue or your bent elbow when you cough or sneeze. Then dispose of the used tissue immediately and safely into a nearby bin.

By following good respiratory hygiene, you protect the people around you from viruses such as cold, flu and Covid-19.

## **5.3) Hand Hygiene**

Staff and pupils should understand why hand hygiene is important as well as when and how to wash their hands.

Schools should promote good hygiene and display posters throughout the schools on how to wash your hands. Follow the HSE guidelines on handwashing:

<https://www2.hse.ie/wellbeing/how-to-wash-your-hands.html>

Hand hygiene can be achieved by hand washing or use of a hand sanitiser (when hands look clean).

Use of hand hygiene facilities including wash hand basins needs to be managed so as to avoid congregation of pupils and staff waiting to use wash hand basins and hand sanitisers.

There is a requirement for access to hand washing facilities after activities that are likely to soil hands, for example playing outside or certain sporting activities as hand sanitiser does not work on dirty hands.

Hand sanitiser dispensers can be deployed more readily at exit and entry points of schools and classrooms and care should be taken to clean up any hand sanitiser spills to prevent risks of falls.

Warm water is preferable to hot or cold water for hand washing but if the plumbing system only supplies cold water, a soap that emulsifies easily in cold water should be used.

Wash hand basins, running water, liquid soap and hand drying facilities should be provided in all toilets, kitchens and any food preparation areas.

Hand washing facilities should be maintained in good condition and supplies of soap and towels should be topped up regularly to encourage everyone to use them.

Hot air dryers are an acceptable alternative for hand drying but must be regularly maintained. There is no evidence that hand dryers are associated with increased risk of transmission of COVID-19.

Posters displaying hand washing techniques and promoting hand washing should be placed on walls adjacent to washing facilities and can be laminated or placed in a plastic sleeve.

Hand sanitiser is suitable for use for hand hygiene when hands are not visibly soiled (look clean).

Evidence of effectiveness is best for alcohol based hand rubs but non-alcohol based hand rubs can be used too.

When hand rubs/gels are being used in school care should be taken to ensure that pupils do not ingest them as they are flammable and toxic. Alcohol-based sanitiser must not be stored or used near heat or naked flame

Young children should not have independent use of containers of alcohol gel.

### **Choosing a Hand Sanitiser**

Hand sanitising gels are biocides and fall under the Biocidal Products Regulation (BPR) – Regulation (EU) 528/2012. The Pesticide Registration and Control Division (PRCD) of the Department of Agriculture, Food and the Marine (DAFM) is the competent authority for biocides in Ireland. Only biocidal products listed on the DAFM biocide product register are legal to market and use in Ireland. Schools should ensure that all sanitisers and disinfectants they have carry a PCS 9xxxx, PCS 1xxxxx, IE/BPA 7xxxx or an EU-000xxx-xx registration number on the label. Each product registered by DAFM will carry a unique registration number specific to that particular product. If the product label does not contain any of these number formats, Schools should not purchase or use the product. To confirm the biocide can be used on the Irish market, Schools can check the registers of products online at [Biocidal Product Registers](#). Further information from DAFM on Sanitisers and Disinfectants is available by contacting them at [biocide-enforcement@agriculture.gov.ie](mailto:biocide-enforcement@agriculture.gov.ie) or at the [Department of Agriculture, Food and the Marine](#) website.

Hand sanitisers for use against COVID-19 must contain a minimum of 60% alcohol. Non-alcohol based hand sanitiser may also be used. However, in choosing a hand sanitiser, it is important to ensure that it is effective against Coronavirus.

### **Frequency of Hand Hygiene**

Pupils and staff should perform hand hygiene:

- On arrival at school;
- Before eating or drinking;
- After using the toilet;
- After playing outdoors;
- When their hands are physically dirty;
- When they cough or sneeze.

A drawdown framework which was established for the 2020/21 school year will continue to remain in place for the 2021/22 school year to enable schools to purchase necessary supplies of hand-sanitisers and PPE requirements. The Department will provide funding for the costs associated with hand sanitising and PPE requirements in schools.

## **5.4) Physical Distancing**

Physical distancing can be usefully applied in primary and special school settings allowing for some flexibility when needed. It must be applied in a practical way to recognise that the learning environment cannot be dominated by a potentially counterproductive focus on this issue. Physical distancing will look different across the various ages and stages of learning. Care should be taken to avoid generating tension or potential conflict and some flexibility in the implementation of measures may be required at times.

It is also recognised that it is not always possible for staff to maintain physical distance from pupils and it is not appropriate that they would always be expected to do so where this could have a detrimental impact on the pupil i.e. if a child sustains an injury and requires first aid.

**However, where possible staff should maintain a minimum of 1m distance and where possible 2m. They should also take measures to avoid close contact at face to face level such as remaining standing rather than sitting beside/crouching down.**

Physical distancing falls into two categories:

- Increasing separation
- Decreasing interaction

### ***Increasing separation***

The guidance documents provided by the Department of Education on optimal school layout and referenced at **Section 4.5** above should be used by schools to increase separation to the greatest degree possible

To maintain physical distancing in the classroom, primary schools and special schools should:

1. Reconfigure class spaces to maximise physical distancing
2. Utilise and reconfigure all available space in the school in order to maximise physical distancing

To support primary schools and special schools in the implementation of physical distancing in the classroom, the Department has developed a suite of illustrative classroom layouts of potential options (including arrangements for special classes) which are in accordance with the public health advice, and assumes

- Room is clear of any unnecessary furniture/shelves etc. on the walls
- A variety of classroom sizes.

[A link to the suite of illustrative primary classroom layouts is available here.](#)

[A link to illustrative special classes is available here.](#)

**The teacher's desk should be at least 1m and where possible 2m away from pupil desks.**

### ***Decreasing interaction***

The extent to which decreasing interaction is possible in a primary or special school will depend on the school setting and a common-sense approach is required recognising the limits to which this can be achieved between pupils.

In primary and special schools a distance of 1m should be maintained between desks or between individual pupils. It is recognised that younger children are unlikely to maintain physical distancing indoors. Therefore achieving this recommendation in the first four years of primary or special schools, is not a pre-requisite to reopening a primary or special school for all pupils.

Where possible work stations should be allocated consistently to the same staff and children rather than having spaces which are shared.

The risk of infection may be reduced by structuring pupils and their teachers into Class Bubbles (i.e. a class grouping which stays apart from other classes as much as possible) and discrete groups or "Pods" within those class bubbles, to the extent that this is practical.

If the class is divided into Pods, there should be at least (1m distance) between individual Pods within the Class Bubble and between individuals in the pod, whenever possible.

Generally speaking the objective is to limit contact and sharing of common facilities between people in different Class Bubbles (and Pods within those Class Bubbles) as much as possible, rather than to avoid all contact between Pods, as the latter will not always be possible.

The aim of the system within the school is that class grouping mix only with their own class from arrival at school in the morning until departure at the end of the school day. The Pods within those Class Bubbles is an additional measures, to limit the extent of close contact within the Class Bubble.

Pod sizes should be kept as small as is likely to be reasonably practical in the specific classroom context.

To the greatest extent possible, pupils and teaching staff should consistently be in the same Class Bubbles although this will not be possible at all times.

Different Class Bubbles should where possible have separate breaks and meal times or separate areas at break or meal times (or this could be different class years i.e. 2<sup>nd</sup> class, 3<sup>rd</sup> class etc.)

Sharing educational material between Pods should be avoided/minimised where possible.

Staff members who move from class bubble to class bubble should be limited as much as possible.



***Additional measures to decrease interaction include:***

Limit interaction on arrival and departure and in hallways and other shared areas.

Social physical contact (hand to hand greetings, hugs) should be discouraged.

Where pupils need to move about within the classroom to perform activities (access to a shared resource) it should be organized to the greatest degree possible to minimize congregation at the shared resource.

Staff and pupils should avoid sharing of personal items.

Encourage pupils to avoid behaviours that involve hand to mouth contact (putting pens/pencils in the mouth).

Where teaching and learning involves use of keyboards or tablets, the contact surface of the device should be cleaned regularly and hand hygiene encouraged.

**Physical Distancing outside of the classroom and within the school**

***School drop off/collection***

Arrangements for dropping off/collecting pupils should be arranged to encourage physical distancing of 2m where possible.

Walking/cycling to school should be encouraged as much as possible.

Arrangements should be made to maintain a distance of 2m between parents and guardians and between parents and guardians and school staff.

Aim of any arrangements is to avoid congregation of people at the school gates where physical distancing may not be respected.

Staggered drop off/pick up times should be considered where practical and feasible.

If schools have additional access points, consideration may be given to whether they can be used to reduce congestion.

Consideration may be given to where pupils congregate as they arrive at school. This could include heading straight to their small group designated learning space/classroom.

***Staff***

A distance of 2m is recommended for physical distancing by staff. This is particularly relevant to distancing between adults when they are not engaged in teaching such as the staff room and arriving to work.

If 2m cannot be maintained in staff groups, as much as distance as is possible and updated guidance on face covering should be observed.

Physical distancing should be observed between staff members within the staff room through the use of staggered breaks etc.

Staff meetings should be held remotely or in small groups or in large spaces to facilitate physical distancing.

Implement no hand shaking policy.

Minimise gathering of school staff at the beginning or end of the school day.

Staff can rotate between areas/classes but this should be minimized where possible.

### ***Canteen/Staffroom***

Ensure physical distancing is applied in canteen/staffroom facilities.

Stagger canteen/staffroom use and extend serving times to align with class groupings. (N/A)

Implement a queue management system.(N/A)

Make sure pupils clean their hands before and after entering the canteen area. (N/A)

### ***Corridors and Stairwells***

Briefly passing someone in a hall is very unlikely to contribute significantly to the spread of infection if people do not have physical contact and avoid informal group discussions.

### ***Yard/Supervision***

The risk of transmission from contact with outside surfaces or play areas is low.

Adjust play time/outdoor activities to minimise crowding at the entrance and exits.

It is not possible to maintain physical distancing when pupils in primary or special schools play together outdoors, but in so far as practical it is helpful to keep to consistent groups.

Stagger break times and outdoor access.

Children should be encouraged to perform hand hygiene before and after outdoor activities.

Minimise equipment sharing and clean shared equipment between uses by different people.

### ***Ventilation***

The Department has published guidance setting out the practical steps for good ventilation in accordance with public health advice '*Practical Steps for the Deployment of Good Ventilation Practices in Schools*' The guidance sets out an overall approach for schools that windows should be open as fully as possible when classrooms are not in use (e.g. during break-times or lunch-times (assuming not in use) and also at the end of each school day) and partially open when classrooms are in use. The guidance provides that good ventilation can be achieved in classrooms without causing discomfort, particularly during cold weather. The Department has also published guidance regarding on how these practical steps measures can be supplemented and enhanced by the use of Carbon Dioxide (CO<sub>2</sub>) monitors. Links to all aforementioned guidance can be accessed [here](#).

## **5.5) Use of PPE in Schools**

The Department has published "[Guidance to Primary and Special Schools on PPE consumables and equipment](#)" on [www.gov.ie/backtoschool](http://www.gov.ie/backtoschool)

This provides schools with the information needed on the appropriate quantities of PPE consumables and equipment to support the safe and sustainable operations of schools.

The updated advice from the HPSC to the Department of Education has recommended that face coverings should be worn by staff members where it is not possible to maintain a physical distance of 2 metres from other staff, parents, essential visitors or pupils. The Department has accepted this recommendation. Accordingly, it is now a requirement for face coverings to be worn by staff members where it is not possible to maintain a physical distance of 2 metres from other staff, parents, essential visitors or pupils. **(Please see note re medical grade masks on page 23)**

**Workers should be trained in the proper use, donning/doffing, cleaning, storing and disposal of PPE. The HPSC has produced posters and videos on the correct donning and doffing of PPE available on the HPSC and HSA websites [https://www.hsa.ie/eng/topics/covid-19\\_coronavirus\\_information\\_and\\_resources/covid-19\\_business\\_supports/business\\_supports/hse-hpsc\\_posters\\_and\\_videos/](https://www.hsa.ie/eng/topics/covid-19_coronavirus_information_and_resources/covid-19_business_supports/business_supports/hse-hpsc_posters_and_videos/)**

PPE will also need to be used at certain work activities or work areas. These might include roles such as:

- Performing intimate care
- Where a suspected case of COVID-19 is identified while the school is in operation
- Where staff are particularly vulnerable to infection but are not in the list of those categorised as people in very high risk groups, or may be living with people who are in a very high risk category
- Administering first aid

Where staff provide healthcare to children with medical needs in the school environment they should apply standard precautions as per usual practice.

### **Reception Areas**

Consideration should be given to the use of Perspex in reception areas where it is not possible for staff to maintain a physical distance of 2 metres from other staff or pupils. Minor works funding grant can be used for this purpose.

### **Face Coverings/Masks**

**The wearing of face coverings or masks in general is not a substitute for other measures outlined below (physical distancing, hand hygiene, respiratory etiquette, adequate ventilation, minimising contacts) but they may be used in addition to these protective measures, especially where maintaining physical/social distancing is difficult.**

Cloth face coverings act as a barrier to help prevent respiratory droplets from travelling into the air and onto other people when the person wearing the face coverings coughs, sneezes, talks or raises their voice. Cloth face coverings are therefore intended to prevent transmission of the virus from the wearer (who may not know that they are infected) to those with whom they come into close contact.

In childcare and educational settings, the implementation of mandatory face-covering usage is challenging, as it is known that children will have a lower tolerance and ability to use the face covering properly, and use of face-coverings by teachers and staff caring for very young children may cause undue stress to the children.

It is not recommended that children attending primary school wear face-coverings.

It is now a requirement for face coverings to be worn by staff members where it is not possible to maintain a physical distance of 2 metres from other staff, parents, essential visitors or pupils.

In certain situations the use of clear visors should be considered, for example staff interacting with pupils with hearing difficulties or learning difficulties.

Cloth face coverings should not be worn by any of the following groups:

- Any person with difficulty breathing
- Any person who is unconscious or incapacitated
- Any person who is unable to remove the face-covering without assistance
- Any person who has special needs and who may feel upset or very uncomfortable wearing the face covering, for example persons with intellectual or developmental disabilities, mental health conditions, sensory concerns or tactile sensitivity.

Further advice from the HPSC on the use of face coverings in educational settings was received on the 6th August 2020. This advice is available [here](#).

All staff wearing face coverings should be reminded to not touch the face covering and to wash or sanitise their hands (using hand sanitiser) before putting on and after taking off the face covering.

Information should be provided on the proper use, removal, and washing of cloth face coverings

<https://www.youtube.com/watch?v=T6ZqdpLfSqw>

Cloth face coverings should be washed after every day of use and/or before being used again, or if visibly soiled.

Face coverings should not be worn if they are wet. A wet cloth face covering may make it difficult to breathe.

Schools should consider having additional disposable face coverings available for staff in case a back-up face covering is needed during the day.

Whilst staff may wish to utilise their own face covering on a day-to-day basis, schools should have available a stock of additional disposable or multi-use face coverings, or if appropriate

face visors, available for staff in case a back-up face covering is needed throughout the day or where required on an ongoing basis.

### **Medical Grade Masks**

Schools must provide medical grade masks in the EN14683 category to all SNAs and teachers in special schools and special classes and those staff by necessity that need to be in close and continued proximity with pupils with intimate care needs including School Bus Escorts.

Wearing a face covering or mask does not negate the need to stay at home if symptomatic.

### **Gloves**

The use of disposable gloves in the school by pupils or staff is not generally appropriate but may be necessary for cleaning, intimate care settings and when administering first aid. Routine use does not protect the wearer and may expose others to risk from contaminated gloves.

Routine use of disposable gloves is not a substitute for hand hygiene.

### **Aprons**

Aprons may also be appropriate in certain circumstances including for intimate care needs or for staff assigned to cleaning an area where a suspected or confirmed case of COVID-19 was present.

## **6) Impact of COVID-19 on certain school activities**

### *Choir/Music Performance*

Choir practices/performances and music practices/performances involving wind instruments may pose a higher level of risk and special consideration should be given to how they are held ensuring that the room is well-ventilated and the distance between performers is maintained.

### *Sport Activities*

Schools should refer to the HPSC guidance on Return to Sport. Link to return to sport protocols is found here.

<https://www.gov.ie/en/publication/07253-return-to-sport-protocols/>

### *Shared Equipment*

### Toys

All toys should be cleaned on a regular basis for example weekly. This will remove dust and dirt that can harbour germs.

Toys that are visibly dirty or contaminated with blood or bodily fluids should be taken out of use immediately for cleaning or disposal.

When purchasing toys choose ones that are easy to clean and disinfect (when necessary).

If cloth or soft toys are used they should be machine washable.

Jigsaws, puzzles and toys that young pupils to those with special educational needs may be inclined to put into their mouths should be capable of being washed and disinfected.

All play equipment should be checked for signs of damage for example breaks or cracks. If they cannot be repaired or cleaned they should be discarded.

Clean toys and equipment should be stored in a clean container or clean cupboard. The manufacturer's instructions should always be followed.

At this time soft modelling materials and play dough where used should be for **individual** use only.

#### Cleaning Procedure for Toys

- Wash the toy in warm soapy water, using a brush to get into crevices.
- Rinse the toy in clean water.
- Thoroughly dry the toy.
- Some hard plastic toys may be suitable for cleaning in the dishwasher.
- Toys that cannot be immersed in water that is electronic or wind up should be wiped with a damp cloth and dried.
- In some situations toys/equipment may need to be disinfected following cleaning for example: toys/equipment that pupils place in their mouths. Toys/equipment that have been soiled with blood or body fluids or toys where a case of COVID-19 has been identified.
- If disinfection is required: A chlorine releasing disinfectant should be used diluted to a concentration of 1,000ppm available chlorine. The item should be rinsed and dried thoroughly.

Art – Where possible pupils should be encouraged to have their own individual art and equipment supplies.

Electronics – Shared electronic devices such as tablets, touch screens, keyboards should be cleaned between use and consideration could be given to the use of wipeable covers for electronics to facilitate cleaning.

Musical Equipment/Instruments – To the greatest extent possible, instruments should not be shared between pupils and if sharing is required, the instruments should be cleaned between uses.

Library Policy – Where practical pupils should have their own books. Textbooks that are shared should be covered in a wipeable plastic covering that can be wiped with a suitable household cleaning agent between uses. Pupils should be encouraged to perform hand hygiene after using any shared item.

Shared Sports Equipment – Minimise equipment sharing and clean shared equipment between uses by different people.

## **7) Hygiene and Cleaning in Schools**

The Department of Education has provided additional funding to schools to support the enhanced cleaning required to minimise the risks of COVID-19.

The specific advice in relation to school cleaning is set out in the HPSC advice and is covered in the induction training. This advice sets out the cleaning regime required to support schools to prevent COVID-19 infections and the enhanced cleaning required in the event of a suspected cases of COVID-19. Schools are asked to carefully read and understand the cleaning advice and to apply that to all areas of the school as appropriate.

Schools are reminded to take particular care of the hygiene arrangements for hand washing and toilet facilities.

In summary, each school setting should be cleaned at **least once per day**. Additional cleaning if available should be focused on frequently touched surfaces – door handles, hand rails, chairs/arm rests, communal eating areas, sink and toilet facilities.

All staff will have access to cleaning products and will be required to maintain cleanliness of their own work area. Under no circumstances should these cleaning materials be removed from the building.

Staff should thoroughly clean and disinfect their work area before and after use each day.

There should be regular collection of used waste disposal bags from offices and other areas within the school facility.

Shower facilities shall not be available for use by staff or pupils due to the increased risk associated with communal shower facilities and areas. This shall be reviewed in line with government guidance.

Staff must use and clean their own equipment and utensils (cup, cutlery, plate etc.) or place them in the dishwasher.

### ***Cleaning/Disinfecting rooms where a pupil/staff member with suspected COVID-19 was present***

The room should be cleaned as soon as practicably possible.

Once the room is vacated the room should not be reused until the room has been thoroughly cleaned and disinfected and all surfaces are dry.

Disinfection only works on things that are clean. When disinfection is required it is always as well as cleaning.

Person assigned to cleaning should avoid touching their face while they are cleaning and should wear household gloves and a plastic apron.

Clean the environment and furniture using disposable cleaning cloths and a household detergent followed by disinfection with a chlorine based product (household bleach).

Pay special attention to frequently touched surfaces, the back of chairs, couches, door handles and any surfaces that are visibly soiled with body fluids.

Once the room has been cleaned and disinfected and all surfaces are dry, the room can be reused.

If a pupil or staff diagnosed with COVID-19 spent time in a communal area like a canteen, play area or if they used the toilet or bathroom facilities, then the areas should be cleaned with household detergent followed by a disinfectant (as outlined in the HPSC interim health advice) as soon as is practically possible.

## **8) Dealing with a Suspected Case of COVID-19**

Staff or pupils should not attend school if displaying any symptoms of COVID-19. The following outlines how a school should deal with a suspected case that may arise in a school setting.

A designated isolation area should be identified within the school building. The possibility of having more than one person displaying signs of COVID-19 should be considered and a contingency plan for dealing with additional cases put in place. The designated isolation area should be behind a closed door and away from other staff and pupils.

If a staff member/pupil displays symptoms of COVID-19 while at school the following are the procedures to be implemented:

- If the person with the suspected case is a pupil, the parents/guardians should be contacted immediately;
- Isolate the person and have a procedure in place to accompany the individual to the designated isolation area via the isolation route, keeping at least 2m away from the symptomatic person and also making sure that others maintain a distance of at least 2m from the symptomatic person at all times;
- The isolation area does not have to be a room but if it is not a room it should be 2m away from others in the room;
- If it is not possible to maintain a distance of 2m, a staff member caring for a pupil should wear a face covering or mask. Gloves should not be used as the virus does not pass through skin;
- Provide a mask for the person presenting with symptoms. He/she should wear the mask if in a common area with other people or while exiting the premises;
- Assess whether the individual who is displaying symptoms can immediately be directed to go home/be brought home by parents who will call their doctor and continue self-isolation at home;
- Facilitate the person presenting with symptoms remaining in isolation if they cannot immediately go home and facilitate them calling their doctor. The individual should avoid touching people, surfaces and objects. Advice should be given to the person presenting with symptoms to cover their mouth and nose with the disposable tissue provided when they cough or sneeze and put the tissue in the waste bag provided;
- If the person is well enough to go home, arrange for them to be transported home by a family member, as soon as possible and advise them to inform their general practitioner by phone of their symptoms. Public transport of any kind should not be used;



- If they are too unwell to go home or advice is required, contact 999 or 112 and inform them that the sick person is a Covid-19 suspect;
- Carry out an assessment of the incident which will form part of determining follow-up actions and recovery;
- Arrange for appropriate cleaning of the isolation area and work areas involved – **(details at Section 7).**

The HSE will inform any staff/parents who have come into close contact with a diagnosed case via the contact tracing process. The HSE will contact all relevant persons where a diagnosis of COVID-19 is made. The instructions of the HSE should be followed and staff and pupil confidentiality is essential at all times. School staff should be encouraged to download the HSE COVID-19 tracker app to assist Public Health for contract tracing purposes. Both in and out of the school setting (see section 5.1).

## **9) Special Educational Needs**

### **Additional considerations for those with Special Educational Needs**

For children with special educational needs (SEN) maintaining physical distancing in many instances will not be practical or appropriate to implement. The focus should therefore be on emphasising that parents/guardians should have a heightened awareness of signs, symptoms or changes in baseline which suggests illness/COVID-19 infection and where symptoms are present children should not attend school.

Similarly staff should be aware of their responsibility not to attend work if they develop signs or symptoms of respiratory illness.

#### *Hand hygiene*

Children who are unable to wash their hands by themselves should be assisted to clean their hands using soap and water or a hand sanitiser (if their hands are visibly clean) as outlined previously.

#### *Equipment*

Some children may have care needs (physical or behavioural) which requires the use of aids and appliances and/or medical equipment for example toileting aids, moving and handling equipment, respiratory equipment. Where cleaning of aids and appliances is carried out in the school it is recommended that a cleaning schedule is provided, detailing when and how the equipment is cleaned and the cleaning products to be used in accordance with the manufacturers' instructions.

The following points can guide the development of such cleaning schedule:

- Equipment used to deliver care should be visibly clean;
- Care equipment should be cleaned in accordance with the manufacturers' instructions. Cleaning is generally achieved using a general purpose detergent and warm water.
- Equipment that is used on different children must be cleaned and, if required, disinfected immediately after use and before use by another child e.g. toileting aids;
- If equipment is soiled with body fluids:

- First clean thoroughly with detergent and water;
- Then disinfect by wiping with a freshly prepared solution of disinfectant;
- Rinse with water and dry.

## 10) Staff Duties

Staff have a statutory obligation to take reasonable care for their own health and safety and that of their colleagues and other parties. The cooperation and assistance of all staff is essential to reduce the risk of spread of COVID-19 and to protect health and safety as far as possible within the school. All staff have a key role to play. In this regard and in order to facilitate a safe return to work, these duties include, but are not limited to, the following:

- Adhere to the School COVID-19 Response Plan and the control measures outlined.
- Complete the RTW form before they return to work.
- Must inform the principal if there are any other circumstances relating to COVID19, not included in the form, which may need to be disclosed to facilitate their safe return to the workplace.
- New staff must complete COVID-19 Induction Training and any other training required prior to their return to school.
- Must be aware of, and adhere to, good hygiene and respiratory etiquette practices.
- Coordinate and work with their colleagues to ensure that physical distancing is maintained.
- Make themselves aware of the symptoms of COVID-19 and monitor their own wellbeing.
- Self-isolate at home and contact their GP promptly for further advice if they display any symptoms of COVID-19.
- Not return to or attend school if they have symptoms of COVID-19 under any circumstances.
- Follow the HSE guidance if they are identified as a close contact.
- **If they have travelled outside of Ireland; in such instances staff are advised to consult and follow latest Government advice in relation to foreign travel.**
- If they develop any symptoms of COVID-19 whilst within the school facility, they should adhere to the procedure outlined above.
- Keep informed of the updated advice of the public health authorities and comply with same.
- Cooperate with any public health personnel and their school for contact tracing purposes and follow any public health advice given in the event of a case or outbreak in their school
- Undergo any COVID-19 testing that may be required as part of mass or serial testing as advised by Public Health

## **11) COVID-19 related Absence Management**

The management of a COVID-19 related absence will be managed in line with agreed procedures with the Department of Education.

## **12) Employee Assistance and Wellbeing Programme**

The Department recognises the need for school staff wellbeing and collective self-care. Support for school staff wellbeing will be provided by Department Support Services including the PDST and CSL, as well as by the HSE's Health Promotion Team. An Occupational Health Strategy is in place as a supportive resource for individual staff members in schools. The aim of the Occupational Health Strategy is to promote the health and wellbeing of employees in the workplace, with a strong focus on prevention. The Occupational Health Strategy comprises the Employee Assistance Service and the Occupational Health Service. The Employee Assistance Service (EAS) is provided by Spectrum.Life under the logo of '*Wellbeing Together: Folláinne Le Chéile*'.

The EAS is a self-referral service where employees have access to a dedicated free-phone confidential helpline 1800 411 057 available 24 hours a day, 365 days a year providing advice on a range of issues such as wellbeing, legal, financial, mediation, management support etc. The service is also available via SMS, WhatsApp, e-mail, live chat and call back request. All points of contact for the service are qualified, accredited and experienced mental health professionals.

Where required, short-term counselling is available to employees and their families (over the age of 18 years and living at home).

The EAS also provides advice and support to managers and delivers interventions to help them deal with health and wellbeing issues in the workplace.

A bespoke wellbeing portal and app is available which offers access to podcasts, blogs, live chats and videos on topics around wellbeing and mental health, family life, exercise and nutrition. E-Learning programmes across mental health, sleep and a range of wellbeing topics are also available. In addition online cognitive behavioural therapy is provided. As part of the services provided by Spectrum.Life a Mental Health Promotion Manager is available to develop and deliver evidence based mental health and wellbeing initiatives to reduce stigma and improve mental health literacy and to increase engagement with the service. Spectrum.Life also provides a series of webinars and presentations to promote wellbeing in schools.

## **APPENDIX 1**

## **COVID-19 Policy Statement**

**Cloughjordan No.1 N.S.** is committed to providing a safe and healthy workplace for all our staff and a safe learning environment for all our pupils. To ensure that, we have developed and updated the following COVID-19 Response Plan. The BOM and all school staff are responsible for the implementation of this plan and a combined effort will help contain the spread of the virus. We will:

- continue to monitor our COVID-19 response and amend this plan in consultation with our staff
- provide up to date information to our staff and pupils on the Public Health advice issued by the HSE and Gov.ie
- display information on the signs and symptoms of COVID-19 and correct hand-washing techniques
- agree with staff, a worker representative who is easily identifiable to carry out the role outlined in this plan
- inform all staff and pupils of essential hygiene and respiratory etiquette and physical distancing requirements
- adapt the school to facilitate physical distancing as appropriate in line with the guidance and direction of the Department of Education
- keep a contact log to help with contact tracing
- ensure staff engage with the induction / familiarisation briefing provided by the Department of Education
- implement the agreed procedures to be followed in the event of someone showing symptoms of COVID-19 while at school
- provide instructions for staff and pupils to follow if they develop signs and symptoms of COVID-19 during school time
- implement cleaning in line with Department of Education advice

All school staff will be consulted on an ongoing basis and feedback is encouraged on any concerns, issues or suggestions.

This can be done through the Lead Worker Representative(s), who will be supported in line with the agreement between the Department and education partners.

Signed: T. Mitchell

Date: 11<sup>th</sup> October 2021

## Appendix 2 - Return to Work Form

This Return to Work Form must be completed by school staff in advance of returning to the workplace. If the answer is Yes to any of the below questions, you are advised to seek medical advice before returning to the workplace.

Name: \_\_\_\_\_ Name of School: \_\_\_\_\_

Name of Principal: \_\_\_\_\_

	Questions	YES	NO
1.	Do you have symptoms of cough, fever, high temperature (38 degrees C or above), difficulty breathing, loss or change in your sense of smell or taste now or in the past 14 days?		
2.	Have you been diagnosed with confirmed or suspected COVID-19 infection in the last 14 days?		
3.	Are you awaiting the results of a COVID-19 test?		
4.	In the past 14 days, have you been in contact with a person who is a confirmed or suspected case of COVID-19?		
5.	Have you been advised to self-isolate at this time?		
6.	Have you been advised to restrict your movements at this time?		
7.	Have you been categorised as 'Very High Risk' or 'High Risk' by the Occupational Health Service (OHS)		

Please provide details below of any other circumstances relating to COVID-19, not included in the above, which may need to be considered to allow your safe return to work e.g. returning from travel abroad.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

\* If your situation changes after you complete and submit this Return to Work Form, please inform your employer.

\*\* Further information on people at very high risk (extremely vulnerable) or high risk from COVID-19 can be found at link: <https://www2.hse.ie/conditions/coronavirus/people-at-higher-risk.html>.

\*\*\* Details of current arrangements for travel overseas can be found set out at <https://www.gov.ie/en/publication/77952-government-advice-on-international-travel/>

Please note: The school is collecting this sensitive personal data for the purposes of maintaining safety within the workplace in light of the COVID-19 pandemic. The legal basis for collecting this data is based on vital public health interests and maintaining occupational health and this data will be held securely in line with our retention policy

## **Appendix 3 Lead Worker Representative – Primary and Special Schools**

The Work Safely Protocol is designed to support employers and workers to put infection control measures in place that will prevent the spread of COVID-19 in the workplace. The Protocol was developed following discussion and agreement between the Government, Trade Unions and Employers at the Labour Employer Economic Forum.

The Protocol provides for the appointment of a Lead Worker Representative (LWR) in each workplace. The LWR will work in collaboration with the employer to assist in the implementation of measures to prevent the spread of COVID -19 and monitor adherence to those measures and to be involved in communicating the health advice around COVID-19 in the workplace.

The purpose of this section is to set out the provisions in respect of the LWR in schools. The operation of these arrangements will be kept under review by the parties.

This document should be read in conjunction with:

- The Work Safely Protocol.
- the Guidance and FAQs for Public Service Employers during COVID-19;
- COVID-19 Response Plan for Primary and Special Schools (available on the Department of Education website).

### **1. Collaborative Approach**

Responsibility for the development and implementation of the COVID-19 Response Plan and the associated infection prevention control measures lies primarily with the Board of Management/ Education and Training Board and school management.

Strong communication and a shared collaborative approach is key to protecting against the spread of COVID-19 in schools, and looking after the health, safety and wellbeing of staff and pupils. Adherence to the Work Safely Protocol will only be achieved if everyone has a shared responsibility in implementing the measures contained within the Protocol in their place of work.

If a staff member has any concerns or observations in relation to the COVID-19 Response Plan, control measures or the adherence to such measures by staff, students or others, they should contact the LWR who will engage with school management.

## **2. Role of the Lead Worker Representative**

In summary, the role of the LWR is to:

- Represent all staff in the workplace regardless of role, and be aware of specific issues that may arise in respect of different staff cohorts;
- Work collaboratively with school management to ensure, so far as is reasonably practicable, the safety, health and welfare of employees in relation to COVID-19;
- Keep up to date with the latest COVID-19 public health advice;
- In conjunction with school management, promote good hygiene practices such as washing hands regularly and maintaining good respiratory etiquette along with maintaining social distancing in accordance with public health advice;
- Assist school management with the implementation of measures to suppress COVID-19 in the workplace in line with the Work Safely Protocol and current public health advice;
- In conjunction with school management, monitor adherence to infection prevention control measures put in place to prevent the spread of COVID-19;
- Conduct regular reviews of safety measures;
- Report any issues of concern immediately to school management and keep records of such issues and actions taken to rectify them;
- Consult with the school management on the school's COVID-19 Response Plan in the event of someone developing COVID-19 while in school including the location of an isolation area and a safe route to that area;
- Following any incident assess with the school management any follow up action that is required;
- Consult with colleagues on matters relating to COVID-19 in the workplace;
- Make representations to school management on behalf of their colleagues on matters relating to COVID-19 in the workplace.

## **3. What can a Lead Worker Representative Do?**

The LWR may consult with, and make representations to, school management on any issue of concern in relation to COVID-19. These include issues in relation to:

- Cleaning protocols and their implementation
- Physical Distancing
- Implementation of one-way systems in the school to ensure social distancing including when entering and exiting the school
- Hand Hygiene facilities including their location and whether they are stocked and maintained
- Hand sanitising
- Staff awareness around hand hygiene in the school
- Respiratory hygiene
- Personal Protective Equipment
- At Risk Groups
- Visitors/Contractors

#### **4. Does a LWR have any legal responsibilities?**

No. A Lead Worker Representative does not have any duties in relation to COVID-19 other than those that apply to employees generally. In other words, the LWR is not responsible for the control measures within an organisation, which remains the employer's responsibility.

#### **5. Lead Worker Representative**

Every school will appoint one Lead Worker Representative.

#### **6. Deputy Lead Worker Representative/ Assistant Lead Worker Representative**

In schools with less than 30 staff, a Deputy Lead Worker Representative will be appointed in addition to the LWR. The role of the Deputy LWR will be to deputise as LWR where the LWR is absent.

In schools with 30 or more staff and in all Special schools, an Assistant Lead Worker Representative will be appointed in addition to the LWR. The role of the Assistant LWR will be to:

- assist the LWR in their duties as set out above; and
- deputise as LWR where the LWR is absent

#### **7. Selection of Lead Worker Representative/ Deputy LWR/ Assistant LWR**

The school staff are entitled to select staff members for the LWR, Deputy LWR and Assistant LWR positions as appropriate. The LWR/ Deputy LWR/ Assistant LWR represents all staff in the workplace regardless of role and must be aware of specific issues that may arise in respect of different staff cohorts. In this regard, if a teacher is selected for the role of LWR, then the Deputy LWR/ Assistant LWR should be selected from the non-teaching staff where feasible and vice versa.

The process for the selection and appointment of the LWR/ Deputy LWR/ Assistant LWR as appropriate should be arrived at by consultation and consensus at school level, through the seeking of volunteers to act in that capacity. Where there is more than one volunteer, all school staff should vote to select the LWR/ Deputy LWR/ Assistant LWR.

The LWR/ Deputy LWR/ Assistant LWR will, following selection by the school staff, be formally appointed by the employer. LWR/ Deputy LWR/ Assistant LWR will be required to confirm, prior to taking up the role, that they have completed the provided training and that they are fully aware of the requirements of the role.

#### **8. Supports for the Lead Worker Representative/ Deputy LWR/ Assistant LWR**

The LWR/ Deputy LWR/ Assistant LWR shall be entitled to:

- Receive information and training in respect of their role;



- Be consulted by school management on the control measures being put in place by the school to minimise the risk of being exposed to COVID-19;
- Regular communication with school management on issues related to COVID-19;
- Be informed of changes in practice arising from COVID-19 response measures;

Where the LWR/ Assistant LWR is a teacher (including a postholder), the 10 Croke Park hours which can currently be used for planning on other than a whole school basis will be utilised by the LWR and Assistant LWR to carry out their duties in that role.

Where the LWR/ Assistant LWR is an SNA, 10 of the “72 hours” will be utilised by the LWR and Assistant LWR to carry out their duties in that role.

Where the LWR/ Assistant LWR is a Secretary or Caretaker, a re-prioritisation of duties by school management should be carried out to afford the staff member sufficient time to carry out their duties in that role.

### **9. Procedure for dealing with issues that arise**

Where an issue of concern is identified by the LWR (or is notified to the LWR by a staff member), the LWR should bring this to the attention of the Principal. Action points for addressing the issue should where possible be agreed between the LWR and the Principal. Staff should be informed of the outcome.

If agreement cannot be reached, the LWR may notify the Board of Management (Chairperson of the BoM in the first instance)/ Education and Training Board head office of the issue. Action points for addressing the issue should where possible be agreed between the LWR and the BoM/ETB head office. Staff should be informed of the outcome.

## Glossary of Terms

- **COVID-19 Response Plan:** plan designed to support the staff and BOM/ ETB in putting infection prevention control measures in place that will prevent the spread of COVID-19 in the school environment. The plan details the policies and practices necessary for a school to meet the Work Safely Protocol, Department of Education and public health guidance to prevent the introduction and spread of COVID-19 in the school environment. COVID-19 Response Plans for Primary and Special Schools are available on the Department's website.
- **Labour Employer Economic Forum (LEEF):** the forum for high level dialogue between Government, Trade Union and Employer representatives on matters of strategic national importance - involves the Irish Congress of Trade Unions, Government & Employers.
- **Work Safely Protocol:** national protocol designed to support employers and workers to put measures in place that will prevent the spread of COVID-19 in the workplace.
- **Safety Representative:** Section 25 of the Safety, Health and Welfare at Work Act 2005 sets out the selection and role of the Safety Representative in the workplace. The rights of the Safety Representative are set out in legislation. (Note: A Safety Representative has rights and not duties under the 2005 Act). This role is separate to the LWR under COVID-19.

## Appendix 4 Risk Assessment

**COVID-19 Risk Template** (List identifies COVID-19 as the hazard and outlines infection prevention control measures required to deal with this risk)

Hazards	Is the hazard present ? Y/N	What is the risk?	Risk rating H=High M=Medium L=Low	Controls (When all controls are in place risk will be reduced)	Is this control in place?	Action/to do list/outstanding controls  *Risk rating applies to outstanding controls outlined in this column	Person responsible	Signature and date when action completed
COVID-19	N	Illness	High	School Covid19 Response Plan in place in line with Department of Education guidance and the Work Safely Protocol and public health advice	Yes	All members of school community will follow public health guidance from HSE re hygiene and respiratory etiquette	All members of school community	Ongoing
				School COVID-19 Policy Statement	Yes		BOM	March 2021
				Return to Work Forms received and reviewed	Yes	Received from all staff, and reviewed	Principal	Ongoing
				Induction Training provided for all staff by the Department of Education	Yes	Completed by all staff	All staff	Beginning of School Year
				Contact Tracing in place	Yes	Contact Tracing Logs in place	All staff	Ongoing
				School Management Checklist		Completed by BOM	BOM	Beginning of School Year
				Covid 19 Self Declaration Forms	Yes	Substitute Teachers	Principal	Ongoing
				Return to Educational Facility Parental Declaration Form	Yes	Parents on return to school by pupils following any absence	Parents	Ongoing

If there is one or more High Risk (H) actions needed, then the risk of injury could be high and immediate action should be taken. Medium Risk (M) actions should be dealt with as soon as possible. Low Risk (L) actions should be dealt with as soon as practicable.

Risk Assessment carried out by: The Board of Management

Date: 11/10/2021

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## Appendix 5 Contact Tracing Log

<b>Name of School</b>				<b>School Contact Person</b>	
<b>Address of School</b>				<b>For Queries only: Phone No</b>	
				<b>Email</b>	
<b>Name of Visitor</b>					Was the visit pre-arranged with the Principal? Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Date of Visit</b>	__ / __ / ____	<b>Time</b>	<b>Entry to school</b> _____ am <input type="checkbox"/> pm <input type="checkbox"/>		<b>Exit from School</b> _____ am <input type="checkbox"/> pm <input type="checkbox"/>
<b>Visitor Status</b>	Contractor <input type="checkbox"/>	Parent/Guardian <input type="checkbox"/>	Other <input type="checkbox"/> Please complete: _____		
<b>Contact details of visitor</b>	Company Name (if applicable)				
	Address				
	Contact No.		Email Address		
	Reason for Visit				
<b>Who the visitor met (separate line required for each person the visitor met)</b>					
<b>Name of Person visited</b>					<b>Length of time spent with each person in the school</b>

## **Appendix 6**                      **Checklist for School Management**

### **Composite Checklist for Schools**

This checklist supports planning and preparation, control measures and induction needed to support a safe return to school for pupils, staff, parents and others.

For completion by the agreed person with overall responsibility of managing the implementation of the COVID-19 Response plan in line with the supports as agreed with Department of Education.

### **Planning and Systems**

1. Is there a system in place to keep up to date with the latest advice from Government and Department of Education, to ensure that advice is made available in a timely manner to staff and pupils and to adjust your plans and procedures in line with that advice?
2. Have you prepared a school COVID-19 response plan and made it available to staff and pupils? ***Department guidance and templates provided***
3. Have you a system in place to provide staff and pupils with information and guidance on the measures that have been put in place to help prevent the spread of the virus and what is expected of them?
4. Have you displayed the COVID-19 posters in suitable locations highlighting the signs and symptoms of COVID-19?
5. Have you told staff of the purpose of the COVID-19 contact log?
6. Have you a COVID-19 contact log in place to support HSE tracing efforts if required? (***Contact log template attached***).
7. Have you informed staff on the measures and provided a system for them to raise issues or concerns and to have them responded to?
8. Have you reviewed and updated risk assessments in line with DES advice to take account of any controls to help prevent the spread of COVID-19? (***Risk template attached***)
9. Have you updated emergency plans, if necessary to take account of the COVID-19 response plan?

### **Staff**

10. Have you made available to each staff member a COVID-19 return-to-work form to be completed and returned before they return to the workplace? (***Template attached***)
11. Have you request confirmation that the details in the Return to Work Form remain unchanged following periods of closure such as school holidays.
12. Are you aware of staff members who are at very high risk under the HSE guidance on people most at risk (HSE guidance on people most at-risk) and advised them of the DE agreed arrangements for management of those staff?
13. Have you advised staff and pupils they must stay at home if sick or if they have any symptoms of COVID-19?
14. Have you advised staff and pupils to follow public health advice if they are identified by the HSE as a close contact of a confirmed case of COVID-19 or if they live with someone who has symptoms of the virus.
15. Have you advised staff and pupils to consult and follow latest Government advice in relation to foreign travel.

16. Have you told staff and pupils what to do and what to expect if they start to develop symptoms of COVID-19 in school, including where the isolation area is?
17. Have you advised staff and pupils to cooperate with any public health officials and the school for contact tracing purposes and follow any public health advice in the event of a case or outbreak in the school;
18. Have you advised staff of the availability of the supports of the occupational health and wellbeing programme through Spectrum Life?
19. Has a lead worker representative been identified (in line with the process agreed with the DE and education partners) and detailed at Section 4.3 of this plan to help advise staff and to monitor compliance with COVID-19 control measures in the school and taken measures to ensure all staff know who the representative is?

### **Training and Induction**

20. Have you advised **new** staff to view the Department of Education's training materials which are available online?
21. Have you taken the necessary steps to update your school induction / familiarisation training to include any additional information relating to COVID-19 for your school?
22. Have first aiders, if available, been given updated training on infection prevention and control re: hand hygiene and use of PPE as appropriate?

### **Buildings / Equipment**

23. If you have mechanical ventilation does it need cleaning or maintenance before the school reopens after periods of closure?
24. Does your water system need flushing at outlets following low usage to prevent Legionnaire's Disease?
25. Have you visually checked, or had someone check, all equipment in the school for signs of deterioration or damage before being used again?
26. Have you arranged for the school, including all equipment, desks, benches, doors and frequent touched surfaces points, to be cleaned once a day

### **Infection Prevention Control Measures in place**

#### **Hand / respiratory hygiene**

27. Have you accessed supplies of hand sanitisers and any necessary PPE equipment in line with the interim HPSC health guidance from the national framework provided by the Department?
28. Are there hand washing/hand sanitising stations in place to accommodate staff, pupils and visitors adhering to hand hygiene measures in accordance with Department guidance?
29. Have arrangements been made for staff and pupils to have regular access to hand-washing/hand sanitising facilities as appropriate?
30. Are hand sanitisers easily available and accessible for all staff, pupils and visitors – e.g. in each classroom and at entry and exit points to school buildings?
31. Have you made arrangements to ensure hand hygiene facilities are regularly checked and well-stocked?

32. Does the alcohol-based hand sanitiser have at least 60% ethanol or 70% isopropanol as the active ingredient?
33. Have you informed staff about the importance of hand washing?
34. Have you arranged for **new** staff to view how to wash their hands (with soap and water for at least 20 seconds) and dry them correctly through the use of the HSE video resource?
35. Have you shown **new** staff and pupils how to use hand sanitiser correctly and where hand-sanitising stations are located?
36. Have you displayed posters on how to wash hands correctly in appropriate locations?
37. Have you told staff and pupils when they need to wash their hands or use hand sanitiser? This includes:
  - before and after eating and preparing food
  - after coughing or sneezing
  - after using the toilet
  - where hands are dirty
  - before and after wearing gloves
  - before and after being on public transport
  - before leaving home
  - when arriving/leaving the school /other sites
  - when entering and exiting vehicles
  - after touching potentially contaminated surfaces
  - if in contact with someone displaying any COVID-19 symptoms
38. Have you told staff and pupils of the importance of good respiratory measures to limit the spread of the virus?
  - avoid touching the face, eyes, nose and mouth
  - cover coughs and sneezes with an elbow or a tissue
  - dispose of tissues in a covered bin

### **Physical Distancing:**

39. Have you identified all available school space to be used to maximise physical distancing?
40. Have you reviewed the templates provided by the Department of Education which show options for revised layout of school rooms to meet physical distancing requirements?
41. Have you arranged to revise the layout of the rooms and furniture as per the Department guidelines if necessary?
42. Have you arranged in each room that the teacher's desk should be at least 1m and where possible 2m away from pupil desks?
43. Have you arranged in each room that pupils would be at least 1m away from each other, whenever possible?
44. Have you allocated work stations consistently to the same staff and children rather than having spaces that are shared?
45. Have you structured pupils and their teachers into Class Bubbles (i.e. a class grouping which stays apart from other classes as much as possible) and discrete groups or "Pods" within those class bubbles to the extent that this is practical?
46. If you have divided a class into Pods, have you arranged at least 1m distance between individual Pods within the class bubble and between individuals in the pod, whenever possible?

47. Have you taken steps to limit contact and sharing of common facilities between people in different Class Bubbles (and Pods within those class bubbles) as much as possible?
48. Have you arranged Pod sizes to be as small as it is likely to be reasonably practical in the specific classroom context?
49. Have you arranged to the greatest extent possible for pupils and teaching staff to be consistently in the same Class Bubbles acknowledging that this will not be possible at all times?
50. Have you arranged where possible that different class bubbles to have separate breaks and meal times or separate areas at break or meal times?
51. Have you made arrangements to limit interaction on arrival and departure from school and in other shared areas?
52. Have you encouraged walking or cycling to school as much as possible?
53. Have you made arrangements, in so far as practicable, to open additional access points to school to reduce congestion?
54. Can you provide a one system for entering and exiting the school, where practical?
55. Have you arranged for staff meetings to be held remotely or in small groups or in large spaces to facilitate physical distancing?
56. Have you a system to regularly remind staff and pupils to maintain physical distancing
57. Have you advised staff not to shake hands and to avoid any physical contact?
58. Have you advised staff of the Department's guidance to achieve good ventilation
59. Have you checked any mechanical ventilation systems to ensure an adequate supply of fresh air is used

### **Visitors to Schools**

60. Have you identified the activities that involve interacting with essential visitors to the school, made arrangements to minimise the number of such visitors and put in place measures to prevent physical contact, as far as possible?
61. Are there arrangements in place to inform essential visitors to the school of the measures to help prevent the spread of infection?
62. Have you a system in place for all visitors who do need to come to the school to make appointment, arrange to contact a central point and to record their visit using the contact tracing log?



## **Appendix 7 Checklist for dealing with a suspected case of COVID-19**

Staff members will be required to manage a suspected case in line with the protocol and training.

A nominated member of the school management team will be nominated as the designated contact person for ensuring that all aspects of the protocol to deal with suspected cases have been adhered to.

### **Isolation Area**

1. Have you identified a place that can be used as an isolation area, preferably with a door that can close?
2. The isolation area does not have to be a separate room but if it is not a room it should be 2m away from others in the room.
3. Is the isolation area accessible, including to staff and pupils with disabilities?
4. Is the route to the isolation area accessible?
5. Have you a contingency plan for dealing with more than one suspected case of COVID-19?
6. Are the following available in the isolation area(s)?
  - Tissues
  - Hand sanitiser
  - Disinfectant/wipes
  - Gloves/Masks
  - Waste Bags
  - Bins

### **Isolating a Person**

7. Are procedures in place to accompany the infected person to the isolation area, along the isolation route with physical distancing from them?
8. Are staff familiar with this procedure?
9. Have others been advised to maintain a distance of at least 2m from the affected person at all times?
10. Is there a disposable mask to wear for the affected person while in the common area and when exiting the building?

### **Arranging for the affected person to leave the school**

11. Staff – have you established by asking them if the staff members feel well enough to travel home?
12. Pupil – have you immediately contacted their parents/guardians and arranged for them to collect their pupil? Under no circumstances can a pupil use public or school transport to travel home if they are a suspected case of COVID-19.
13. The affected person should be advised to avoid touching other people, surfaces and objects.
14. The affected person been advised to cover their mouth and nose with disposable tissue(s) when they cough or sneeze, and to put the tissue in the bin.

15. Has transport home or to an assessment centre been arranged if the affected person has been directed to go there by their GP?
16. Has the affected person been advised not to go to their GP's surgery or any pharmacy or hospital?
17. Has the affected person been advised they must not use public transport?
18. Has the affected person been advised to continue wearing the face mask until they reach home?

### **Follow up**

19. Have you carried out an assessment of the incident to identify any follow-up actions needed?
20. Are you available to provide advice and assistance if contacted by the HSE?

### **Cleaning**

21. Have you taken the isolation area out-of-use until cleaned and disinfected?
22. Have you made arrangements to clean and disinfect any classroom space where the staff or pupils were located?
23. Have you arranged for cleaning and disinfection of the isolation area and any other areas involved, as soon as practical after the affected person has left the building?
24. Have the cleaners been trained in dealing with contaminated areas and supplied with the appropriate PPE?).

## **Appendix 8      Checklist Lead Worker Representative**

1. Have you agreed with your school to act as a Lead worker representative for your school?
2. Have you been provided with information and training in relation to the role of lead worker representative if you are new to the role?
3. Are you keeping up to date with the latest COVID-19 advice from Government?
4. Are you aware of the signs and symptoms of COVID-19?
5. Do you know how the virus is spread?
6. Do you know how to help prevent the spread of COVID-19?
7. Have you watched and do you understand the online Induction Training provided by the Department of Education before returning to school?
8. Are you helping in keeping your fellow workers up to date with the latest COVID-19 advice from Government?
9. Have you completed the COVID-19 return-to-work form and given it to your school?  
(*Department template Return-to-Work form available*)
10. Are you aware of the control measures your school has put in place to minimise the risk of you and others being exposed to COVID-19? (*Checklist for School Management available*)
11. Did your school consult with you when putting control measures in place? *Control measures have been agreed centrally between the Department and education partners. Consultation at school level should take place on any specific local arrangements necessary to implement the protocol*

- 12.** Have you a means of regular communication with the person with overall responsibility for the school COVID-19 plan?
- 13.** Are you co-operating with your school to make sure these control measures are maintained?
- 14.** Have you familiarised yourself with the cleaning requirements needed to help prevent cross contamination? (*Checklist for Cleaning and Disinfection available*)
- 15.** Have you been asked to walk around and check that the control measures are in place and are being maintained?
- 16.** Are you reporting immediately to the person with overall responsibility for the school COVID-19 plan any problems, areas of non-compliance or defects that you see?
- 17.** Are you keeping a record of any problems, areas of non-compliance or defects and what action was taken to remedy the issue?
- 18.** Are you familiar with what to do in the event of someone developing the symptoms of COVID-19 while at school?
- 19.** Are you co-operating with your school in identifying an isolation area and a safe route to that area? (*Checklist for dealing with suspected case of COVID-19 available*)
- 20.** Are you helping in the management of someone developing symptoms of COVID-19 while at school?
- 21.** Once the affected person has left the school, are you helping in assessing what follow-up action is needed?
- 22.** Are you helping in maintaining the contact log?
- 23.** Have you been made aware of any changes to the emergency plans or first aid procedures for your school?
- 24.** Are you making yourself available to fellow staff to listen to any COVID-19 control concerns or suggestions they may have?
- 25.** Are you raising those control concerns or suggestions with your school and feeding back the response to the worker who raised the issue?
- 26.** Are you aware of the availability of the Spectrum Life Wellbeing Together Programme?

## **Appendix 9 Checklist for Cleaning**

1. Have you a system in place for checking and keeping up to date with the latest public health advice from Government and the Department of Education, to ensure that advice is made available in a timely manner in order to adjust your cleaning procedures in line with that advice?
2. Have you reviewed the HPSC interim health advice for the safe reopening of schools, in particular **Section 5.6 Environmental Hygiene**?
3. Have you explained the need for the enhanced cleaning regime to staff?
4. Are you aware that cleaning is best achieved using a general purpose detergent and warm water, clean cloths, mops and the mechanical action of wiping and cleaning, following by rinsing and drying?
5. Have you sufficient cleaning materials in place to support the enhanced cleaning regime?
6. Have you provided training for cleaning staff on the enhanced cleaning regime?
7. Have you made arrangements for the regular and safe emptying of bins?
8. Are you familiar with the cleaning options for school settings set out in the interim HPSC health advice for schools for surfaces, toilets, cleaning equipment, PPE and waste management?
9. Are you aware that each school setting should be cleaned once per day?
10. Have you provided cleaning materials to staff so that they can clean their own desk or immediate workspace?
11. Have you advised staff that they are responsible for cleaning personal items that have been brought to work and are likely to be handled at work or during breaks (for example, mobile phone and laptops) and to avoid leaving them down on communal surfaces or they will need to clean the surface after the personal item is removed?
12. Have you advised staff and pupils to avoid sharing items such as cups, bottles, cutlery, and pens?
13. Have you put in place a written cleaning schedule to be made available to cleaning staff including:
  - Items and areas to be cleaned
  - Frequency of cleaning
  - Cleaning materials to be used
  - Cleaning of frequently touched surfaces such as vending machines, coffee machines and door handles
  - Equipment to be used and method of operation?
14. Details of how to clean following a suspected case of COVID-19 are at **Section 7 of the Plan above**
15. If disinfection of contaminated surfaces is required, is a system in place to do this following cleaning?
16. If cleaning staff have been instructed to wear gloves when cleaning are they aware of the need to wash their hands thoroughly with soap and water, both before and after wearing gloves?
17. Have you a system in place for disposing personal waste such as cleaning cloths and used wipes in a rubbish bag? The Protocol advises *that personal waste such as cleaning*

*waste, tissues etc. should be double bagged and stored in a secure area for 72 hours before being presented for general waste collection.*

- 18.** Have you ensured there is a system in place to make sure reusable cleaning equipment including mop heads and non-disposable cloths are clean before re-use?
- 19.** Have you ensured there is a system in place to ensure that equipment such as buckets are emptied and cleaned with a fresh solution of disinfectant before re-use?