



COVID-19 Compliance code for all educational settings

1. Introduction and document updates ..... 3

2. Specific responsibilities ..... 5

3. Principles of safe working ..... 6

4. Safe working ..... 7

4.1 Management Planning ..... 7

Senior Management Team ..... 7

Premises and premises management (including cleaning) ..... 8

Staffing ..... 9

4.2 Minimise contact, maintain social distancing and activity risk reduction measures ..... 10

Other general measures ..... 13

Measures within the classroom ..... 14

Playgrounds ..... 14

Specialist curriculum and educational programmes ..... 15

Music, dance and drama ..... 15

Physical activity ..... 16

Subjects involving practical activities ..... 18

Supervised toothbrushing programmes ..... 18

Examinations ..... 18

Educational visits ..... 19

Where a pupil attends more than one setting ..... 19

Extra-curricular provision and wraparound care ..... 20

Measures for arriving and leaving ..... 21

Transport and travel ..... 22

Visitors (including familiarisation and parents evenings) ..... 22

Movement around the premises ..... 24

Lunchtime and Breaks ..... 24

Ventilation ..... 25

Toilets and handwashing facilities ..... 26

Personal protective equipment (PPE) ..... 27

Face coverings ..... 27

4.3 Universal hygiene ..... 29

Cleaning and disinfection ..... 29

Handwashing/cleaning arrangements ..... 31



**COVID-19 Compliance code for all educational settings**

---

**Respiratory hygiene arrangements**..... 33

**Washing and laundry** ..... 33

**Specific equipment required**..... 33

4.4 **Health, Well-Being and attendance**..... 33

**Pupils** ..... 33

**Pupil well-being and support**..... 35

**Staff Health and Well-Being** ..... 37

4.5 **Communication and Involvement** ..... 37

**Information for parents and carers (and pupils where age appropriate)** ..... 38

**Information, instruction and training**..... 39

**Behaviour expectations and Policy** ..... 40

**Internal meetings and events** ..... 40

**Championing COVID-19 measures**..... 41

**Education Tools** ..... 41

4.6 **Responding to infection**..... 42

4.7 **Offices and other work spaces**..... 42

4.8 **Planning for Emergencies**..... 43

**First aid**..... 43

**Fire** ..... 44

4.9 **Hiring School Premises (and providing premises for club use)** ..... 44

**5. Review** ..... 45



## COVID-19 Compliance code for all educational settings

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### 1. Introduction and document updates

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The health, safety and well-being of all staff and pupils is of utmost importance to us. This guidance has been provided to give all our staff, parents and pupils the assurance that appropriate control measures are being put in place in response to Coronavirus COVID-19 and reflects Government guidance.

Statistical analysis suggests that staff in educational settings tend not to be at any greater risk than many other occupations and there is no evidence that children transmit COVID-19 any more than adults. The risk to children themselves of becoming severely ill from coronavirus (COVID-19) is very low.

Educational settings are being asked to develop a system of controls that manages the risk balanced with the need to deliver full time education and a full curriculum. All settings must:

- Ensure that people who are ill or have been asked to isolate stay at home
- Implement enhanced cleaning arrangements Implement robust universal hygiene measures
- Encourage the active engagement of staff and families with NHS Test and Trace services

In addition, where possible, and balancing the need to provide full education provision with the risks of transmission settings should:

- Minimise the number of contacts that pupils and staff have during the school day and maximise distancing between those in school
- Minimise the potential for cross contamination

Public Health England (PHE) are clear that if settings follow these requirements (which are included in this compliance code), then they can be confident that risks are being effectively managed.

This compliance code details the arrangements that must be put in place and should be used to develop your risk assessment which is provided in *COVID-19 Educational Settings Risk Assessment*. It sets out:

- The control measures which are required to minimise the risk of transmission
- The process that should be followed if anyone develops symptoms while they are at the setting.

This compliance code sets out the measures necessary to enable leaders to make informed judgments about how to balance delivering a broad and balanced curriculum with the need to effectively manage risks, considering the needs of their school and community.

**COVID-19 Compliance code for all educational settings**

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The Compliance Code reflects the government’s latest guidance for schools as well as all other relevant guidance relating to other activities including office work, performing arts, cleaning non-healthcare settings etc

It should be read in conjunction with all other guides and template documents relating to schools. These are available on infospace and the Norfolk Schools site.

For ease of reference, changes that are made to this document are detailed below:

Date of change	Section, Page and Change
10-07-2020	New document
04-08-2020	<p>Reference to new documents:</p> <ul style="list-style-type: none"> <li>• COVID-19 guidance for Swimming Pools</li> <li>• COVID-19 cleaning and disinfection supplementary information</li> </ul> <p>Sections reworded for clarity with no new requirements:</p> <ul style="list-style-type: none"> <li>• Staffing</li> <li>• Minimise contact, maintain social distancing and activity risk reduction measures</li> <li>• Cleaning and disinfection (to refer to new supplementary information).</li> </ul> <p>New information in this compliance code: Foggers, UV devices and misters Aerosol Generating Procedures</p>
21-08-2020	<p>Ensuring that contractors are COVID-19 Secure. Updated section for Music and Drama Links to new CLEAPSS information and Supervised Toothbrushing programme requirements. New – spaces without appropriate ventilation Updated section regarding the use of face coverings Confirmation – desks and chairs should be disinfected between use by different pupils New – premises hire and after school club use.</p>
27-09-20	<p>Contractors have been contacted in advance and their activities on site have been discussed. Peripatetic teachers and invigilators are referred to in the staffing section. Ensure that taking resources home is minimised, and that quarantining and cleaning arrangements are in place. Music, dance and drama has been updated Physical activity has been updated New section – Autumn Examinations</p>

## COVID-19 Compliance code for all educational settings

	<p>Wraparound care – added to extra-curricular provision and section updates highlighted</p> <p>School vehicles – section updated</p> <p>Visitor section updated to reflect familiarisation and parents evenings</p> <p>Face coverings section updated</p> <p>First aid – new information added</p>
13-10-20	<p>Small amendment to wrap around care requirements – removal of rule of six</p> <p>Clarification that wearing face coverings does not exempt you from the requirements on close contacts of positive cases to self-isolate</p>
21-10-20	<p>Changed wording from local lockdown to new alert level terminology.</p> <p>Updated shielding for pupils information to reflect new alert level advice.</p> <p>Updated information on temporary staffing</p> <p>Updated information on ventilation for the winter</p> <p>Updated information on performing arts</p>
13-11-20	<p>Updated guidance on Aerosol Generating Procedures and first aid requalification</p> <p>Addition of information about where QR codes must be available in educational settings – visitor events and letting to external providers</p>
01-02-2021	<p>Minor changes to clarify when first aid certification validity has been extended to.</p> <p>Updates to fix some broken links</p>
24-02-2021	<p>Changes to reflect updated government guidance on full reopening of education settings including the use of face coverings, testing, educational visits and wrap around care</p>

## 2. Specific responsibilities

Your existing health and safety responsibilities and those of your staff as outlined in your school's health and safety policy continue to apply. Transmission of COVID-19 is a work-related risk that requires the same management approach as any other: undertake a risk assessment, identify the necessary control measures, implement these including safe working practices, consult and communicate with your staff and manage and monitor the effectiveness of the control measures.

It is important to ensure that all required control measures are implemented in order to manage the risk effectively in the same way you normally would with other health and safety related risks. In the event of a case or outbreak in your setting the controls outlined in this Compliance Code and other related guidance would be used by enforcing authorities as a benchmark for compliance with the law.

## COVID-19 Compliance code for all educational settings

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### 3. Principles of safe working

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The transmission of COVID-19 is thought to mainly be through respiratory droplets generated by coughing and sneezing, and through contact with surfaces that have been contaminated with droplets either directly from a cough or sneeze or indirectly, from someone who has the virus on their hands touching it e.g. from coughing into your hands.

However, research has also identified the presence of COVID-19 virus in other bodily fluids of confirmed cases. All bodily fluids (except sweat), including diarrhoeal stools from people with known or possible COVID-19, should be regarded as potentially infectious. There is also emerging evidence that transmission can occur via aerosols from breathing out particularly where you are in close contact with the infected person or these are propelled as a result of shouting, singing or via other means such as musical instruments.

In summary, there are two primary routes by which COVID-19 can be transmitted:

- infection can be spread to people through close contact with infected individuals and respiratory droplets or aerosols generated during coughing, sneezing and breathing.
- direct contact with infected tissues, body fluids or indirect contact with contaminated surfaces such as door handles and then touching their own mouth, nose, or eyes.

Current evidence suggests that most people will not be infectious until the onset of symptoms although there is emerging evidence of the significance of pre and asymptomatic infectivity. Therefore, for the purposes of contact tracing you will be required to take appropriate action if you have been in close contact with anyone for 2 days before and up to ten days after they have developed symptoms. Evidence suggests that the risk of transmission increases the more often and the longer someone has close contact with a symptomatic person and therefore a close contact is defined as someone you have spent any amount of time in face to face contact with within 1 metre or anyone you have spent 15 minutes or more with, within 2 metres (this can be cumulative throughout the day).

The longer you are exposed to an infected person and the closer proximity you have to them the greater the risk of you catching the virus.





## COVID-19 Compliance code for all educational settings

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Therefore, to limit the spread of the virus we need to minimise the available transmission routes and the time of exposure. This compliance code details how to implement the combination of approaches which are shown in the diagram above. This compliance code takes you through the measures required to achieve this including:

### Limiting direct contact:

- Cohorting staff and pupils to reduce the number of people transmission can occur between;
- Implementing social distancing (keeping 2m distance) as much as is possible both within and between cohorted groups.
- Working outdoors where possible or in well ventilated areas
- Organising spaces and facilities to support distancing
- Organising activities to support distancing

Everyone applying excellent **universal hygiene measures** at all times and the setting enabling this through the provision of hand sanitiser points, signage, supervision and information.

Enhanced **cleaning** of the premises, equipment and items

**Wearing PPE if required:** For most of us in our roles PPE is not required. That is because all the measures described above will significantly reduce the risk. Using PPE where it is not necessary may mean that we are increasing transmission risk to ourselves and others and may use a scarce resource needed by others working in increased risk roles. Separate guidance on when PPE should be used and how is provided.

## 4. Safe working

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### 4.1 Management Planning

Headteachers and managers can communicate powerful signals about the importance and significance of safe working arrangements through their own action. Leading by example will support others to feel they can do the same and that new ways of working are possible. Equally, the development of a positive culture can be undermined through negative behaviour. It is likely that we will need to manage with COVID-19 for some time to come, it is important therefore, for leaders and managers to consider the culture they are setting by the arrangements they put in place to deliver education and learning in a way that is safe and secure for everyone, children, staff and parents.

### Senior Management Team

In planning how you will extend opening to all pupils at the setting management teams must ensure that:

- Your assessment fully considers the requirements of this compliance code



## COVID-19 Compliance code for all educational settings

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- The assessment is carried out in conjunction with staff and staff representatives (and pupils where appropriate).
- Arrangements are in place to ensure compliance with the standards that have been set and the controls identified through the risk assessment
- Regular review of this assessment takes account of feedback, concerns, suggestions and changes in line with updated information from Health, Safety and Well-being.
- Safeguarding arrangements are not impacted as a result of changes to working arrangements.
- The continuity of essential supplies is considered in order to operate safely.
- Governors are involved and are supporting the setting to ensure that actions are completed (further information is provided in the [school governance update](#))
- Accurate records of site users (visitors, staff and pupils) are maintained for 21 days following the COVID-19 Case Management Guidance requirements and settings must publish a GDPR statement on keeping and using visitor records
- COVID-19 Educational Settings - Case Management Guidance is implemented.
- COVID-19 Educational Settings – management of cases risk assessment and checklist is completed.
- COVID-19 Cleaning and Disinfection – supplementary information for Education Settings has been completed.
- COVID-19 Exams Checklist has been completed where applicable.
- Individual risk assessments are completed where required
- All guidance referred to in this compliance code is reflected in your safe working arrangements.
- All contractors who provide services on school premises are COVID-19 Secure, are aware of your expectations and requirements and have been contacted in advance to discuss their activities on site.
- The Headteacher and Chair of Governors should sign and display the COVID Secure notice in order to confirm that you have carried out the risk assessment:
  - COVID-19 Secure in Primary and Early Years Settings
  - COVID-19 secure in Secondary Settings

Detailed actions required for assessing and delivering safe working arrangements in relation to COVID-19 are detailed in the Risk Assessment Checklist.

### **Premises and premises management (including cleaning)**

It is unlikely to be necessary for schools to make significant adaptations to their site or need to acquire additional premises due to the fact that:

- class sizes can return to normal
- spaces used by more than one class or group can be cleaned between use.

Some schools may determine as a result of carrying out their assessment that small adaptations are required, such as installation of automatic door closers to reduce the





## COVID-19 Compliance code for all educational settings

---

number of touch points, door retainer devices that keep fire doors open unless there is an alarm, efficient hand dryers to ensure pupils dry their hands thoroughly after washing their hands, lever taps to reduce the need to touch taps with hands. Any adaptations that can be made that reduce the number of hand contact points and support the improvement of hand or respiratory hygiene are positive steps to supporting infection control. Settings could consider staggering such improvements where time and resources are limited.

All settings will be expected to install hand hygiene points (hand sanitiser) at relevant locations around the site. Research shows that event prompts are an effective means to improve hand hygiene. Further information is provided in this code.

The requirements of this compliance code must be applied to all normal premises management activities for example, managing contractors on site and fire evacuation arrangements.

Premises management activities should be scheduled to avoid times when pupils and staff are using the same areas.

Staff who carry out cleaning activities should be provided with the required cleaning equipment, be familiar with the cleaning and disinfection processes that are now required and have adequate time to carry out tasks effectively.

### Staffing

Settings are now able to welcome all staff back to support the delivery of a broad and balanced curriculum including supply teachers, peripatetic teachers, invigilators, coaches, specialist teachers, tutors or professional support workers, trainee teachers and volunteers.

It is recognised that some staff will need to work across different bubbles or groups or across different settings and this is permitted. In order to minimise transmission however, the following should be applied **as much as is possible**:

- Keep temporary, visiting and external staff numbers as low and consistent as is possible,
- Assign all staff whether permanent, temporary or visiting specialists to consistent groups to limit the number of children they interact with. This may mean rearranging coaching timetables to longer rotas than normal
- Ensuring temporary, visiting or external staff minimise contact with, and maintain 2m distance from, permanent staff

**Remember the more people someone has contact with the more opportunities for the virus to transmit and the greater number of people that may be required to isolate if they were to test positive.**



## COVID-19 Compliance code for all educational settings

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Where staff can work from home they should continue to do so even if for part of the working week. Therefore, settings should assess what is feasible and appropriate for example, for administrative roles.

### **4.2 Minimise contact, maintain social distancing and activity risk reduction measures**

Separation of people and the use of consistent groups to limit interactions with others is important in education settings to minimise the possibility of virus transmission. We do this because:

- This helps to reduce the risk of transmission of the virus. The more people we are in contact with the more likely we will come across the virus, and if you have the virus, the more people you can pass it on to.
- It minimises the number of people that will need to isolate if someone tests positive.
- It helps to identify who needs to isolate more easily if someone tests positive.

It is not possible to outline the numerous ways that settings may develop their bubbles or groups as this will depend on a number of factors such as the size of the setting, the availability of staff, the curriculum needs, transport needs and wraparound care or extra curriculum provision. Therefore, the following principles should be applied taking into consideration local circumstances:

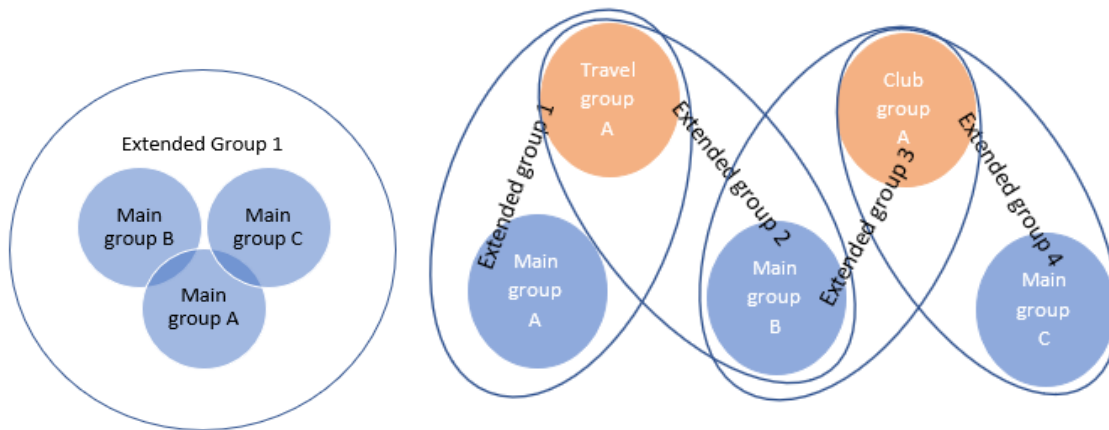
- Develop main groups (bubbles) that are the smallest practicable.
- Consideration should be given to reducing the number of children to staff ratio further where possible in order to assist with applying social distancing measures. The circumstances where this should be considered include: when carrying out practical activities such as some secondary curriculum subjects, music, or because of health conditions or understanding of the children.
- Develop extended groups or bubbles where necessary to account for school transport limitations (see travel and transport), siblings attending wraparound care together not being in the same year group, the provision of specialist activities or in secondary education to deliver specialist subjects etc. Extended groups could be based on school years or other formal groups already in existence.

The diagram below illustrates how the use of extended groups may work.

In the first example the extended group could be a year group or something similar and the main groups are different subject groups. If a child in main group B tested positive both group B and group A would need to isolate because they are all close contacts of the child. Group C would not initially need to isolate but they would be at increased risk of catching the virus because of their connection to group B through children from group A they take lessons with.

## COVID-19 Compliance code for all educational settings

In the second example a child in main group B tests positive, they also belong to travel group A and club group A e.g. for wraparound care, this results in main group B, travel group A and club group A all needing to isolate because they are close contacts. The children in main group A and C that are not part of the extended groups will not need to isolate at this time but are at increased risk of catching the virus.



It remains important to minimise contact within groups as well as between groups through distancing measures where this can be done. However, where separation within younger groups impedes educational development or impacts on well-being mixing is permitted e.g. for early years development. However, wherever activities can be undertaken maintaining distance without detriment to development or well-being, it should.

Particular attention should be paid to the following areas and implemented where it is possible to (further details are provided throughout this code):

- Keeping groups static and not mixing with other groups.
- Staggering starting, lesson, break and finishing times as much as possible to prevent transit routes from getting busy and mixing of groups even for short periods. Remember, a close contact is any face to face contact within 1m for any period of time, so pupils stopping for a brief chat in a corridor may be considered as a close contact and could give the virus enough opportunity to pass from person to person. It is recognised that settings that rely on public transport or school transport services may not be able to alter start and finish times as much as other settings. However, settings must still consider how this can be managed to prevent mixing of groups once at the setting and transit routes getting busy.
- Reducing the need for groups to move around the setting e.g. conducting assemblies remotely using technology, lunch being taken in classrooms, using the same classroom for as many lessons as possible. In high schools, where you don't need specific resources for a lesson, teachers should travel to the class rather than the class to the teacher.



## COVID-19 Compliance code for all educational settings

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- Where classrooms are being used by different groups that are not in the same 'extended group' the teacher should wipe down common touch points with disinfectant wipes between groups e.g. door handles, desks. You do not need additional training or any PPE to use disinfectant wipes
- Members of staff should remain consistent within groups as much as they can. Where members of staff need to be connected to more than one group e.g. for teaching specialist subjects, the other infection control measures must be scrupulously followed i.e. maintaining social distance, hand hygiene. Where these cannot be followed for particular groups of pupils dedicated members of staff must be assigned to that group/individual
- Where wraparound care is provided by external organisations/run separately from the setting, settings should work with providers to maintain consistent groupings between each provision as far as is possible.
- How shared spaces will be managed such as toilets, dining halls, playgrounds

By following this compliance code, this approach still brings infection control benefits as it reduces the network of possible direct transmission, even where main groups need to be extended and where close contact cannot be achieved all of the time, for example, due to age.

### Remember, the implications of mixing within and between groups are:

- **This increases the risk of transmission of the virus between people**
- **More people, staff and pupils will need to isolate for 10 days if someone from the setting tests positive**
- **It may be difficult to identify who has been a close contact and therefore the virus will have a chance to spread undetected**

Therefore:

- Children who are old enough must be supported to maintain distance and not touch staff or their peers
- Face to face contact and the time spent within one metre of anyone must be avoided where it is possible.
- Where staff or children cannot maintain distancing (particularly with younger children) the risk must be reduced by ensuring that groups do not mix.

### ***Planned close contact activities***

It is recognised that close contact occurs in Primary and Early Years Settings and may in some instances be necessary in Secondary settings and this is a core principle of reducing the number of contacts a child has through creating smaller groups (of pupils and staff) and implementing the infection control measures described in this document. In addition to those measures, planning should include:

- Considering the hand contact with surfaces such as changing beds, wheelchair, hoists. Ensure that they are cleaned and disinfected before and after use.



## COVID-19 Compliance code for all educational settings

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- Ensuring that staff increase their level of self-protection, performing hand hygiene before and after carrying out the task
- Ensuring that the pupil washings their hands before and after where they are able to or use skin friendly hand wipes before and after.
- Checking that the person does not have symptoms as described in this document.

Please note: where a non-symptomatic pupil already has routine intimate care needs that involve the use of PPE, the same PPE should continue to be used.

### Other general measures

- Outdoor spaces lower the risk of transmission and the use of outdoor spaces must be maximised. However, the principles of grouping or bubbles as outlined above also apply when operating in outdoor spaces so groups must be kept apart, and social distancing applied.
- Large gatherings such as assemblies with more than one group must be avoided.
- Movement around the school must be kept to a minimum and movements managed through the most appropriate means for the setting such as one-way systems, use of alternative exits and entrances.
- Queues are avoided where possible, and distance markings provided where queuing is likely
- Consideration must be given to staggered break, lunchtimes and other times where movement around the school is needed
- The use shared staff spaces should be minimised, configured to avoid sitting face to face and to achieve social distancing
- Pupils should limit the amount of equipment they bring into school each day, to essentials such as lunch boxes, hats, coats, books, stationery and mobile phones. Bags are allowed. Where they are brought in, they should only be used by that child.
- The allocation of lockers and cloakrooms must take into account the assigned groups, so that groups are not compromised when they are being used.
- Where bags are not allowed to be kept at desks/workspaces e.g. science lessons or DT lessons consideration should be given as to how these can be safely stored in a way that won't encourage pupils congregating and touching each other's belongings e.g. use of lockers, bag hooks
- Activities that encourage or cause people to raise their voices or shout must not take place.
- Pupils and teachers can take books and other resources home where necessary for educational and development, although this should be minimised as much as possible. The requirements for hand hygiene, quarantining and cleaning of resources must be applied where resources are taken home, to minimise the risk of transmission)
- Arrangements for collecting, passing on and returning shared resources and equipment is planned to prevent close contact.
- Larger spaces are not used by more than one group without physical partitioning.



## COVID-19 Compliance code for all educational settings

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### Measures within the classroom

When planning educational activities consideration should be given to the physical environment, the type of activities and the equipment and resources needed. Including:

- Consider where you can use alternative larger spaces such as gyms and halls to accommodate groups
- Encouraging distancing by reconfiguring furniture, unnecessary furniture and objects should be removed where possible.
- Ensure seating is forward facing,
- The position of the teacher's space/desk should also be considered as part of this configuration to support distancing from the class.
- The teaching approach should be modified to keep a distance from children in the class as much as possible, particularly close face to face support (noting that it is understood that this is not possible at all times, which is why hygiene and hand cleaning is so important).
  - Where close contact is needed this should be conducted side by side rather than face to face.
  - Avoid calling pupils to the front of the class or going to their desk to check on their work.
  - Avoiding using shared resources as much as possible, particularly those used frequently such as pens and pencils as well as limiting those that are taken home.
  - Pupils should not share or swap resources and materials including ceasing the marking of each other's books.
- Classroom based resources, such as books and games, can be used and shared within the bubble; these should be cleaned regularly, along with all frequently touched surfaces (refer to cleaning and disinfection).
- Children are able to bring toys and other resources in from home, but these should be minimised and not be shared with the group.
- Consideration should be given as to how pupils enter and exit the classroom. This should be managed to maintain distancing.

**Remember, the greater the frequency and length of close interactions the increased risk of transmission and the more important additional infection control measures become.**

### Playgrounds

The following measures must be implemented for playgrounds:

- Implement signage to identify the maximum number of users for equipment and encourage maintaining distance both waiting for and while using equipment
- Remove or mark off seats to encourage distancing
- Supervise the use of equipment, implementing a time limit for each user to enable other users to take their turn and reduce the possibility of them encroaching on distance space through frustration



## COVID-19 Compliance code for all educational settings

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- Implement a one-way system around outdoor gym equipment or trim trails
- Consider taking equipment out of use where it is positioned close to other equipment, particularly if it encourages face to face play
- Install hand sanitiser stations near to play equipment and instruct users to utilise this before and after play
- Install bins nearby to encourage use of tissues and appropriate disposal
- Allocate time on the play equipment for each group/bubble
- Clean equipment touch points frequently, and between each group's use

### Specialist curriculum and educational programmes

#### *Music, dance and drama*

Performing arts activities are an area of on-going research in relation to the transmission risks. The advice and guidance on this area evolves as the evidence base develops. The most recent guidance suggests that the increased risk is due to the cumulative build up and transmission of aerosols created by volume from singing, shouting and playing of wind and brass instruments. Therefore, performing arts activities are considered generally higher in risk than other activities meaning particular attention must be paid to mitigating measures. Such activities should take place outdoors wherever possible and, in all cases, (whether indoors or outdoors) following the measures below:

- Care must be taken to observe social distancing as much as is possible. This may limit group activity in these subjects in terms of numbers in each group depending on the available space.
- Keep background or accompanying music to levels that do not encourage participants to raise their voices unduly.
- Use microphones where possible to reduce the need to shout or sing loudly or encourage children to sing quietly.
- Use arrangements such as side to side or back to back working rather than face to face.
- Position wind and brass players so that the air from their instrument does not blow into another player.
- Teachers must avoid carrying out physical correction involving contact in dance, drama or music. Avoid situations where distancing requirements cannot be followed, for example, partnering work in dancing
- Drama activities should be planned considering one-way systems and mapping movements to ensure social distancing
- Avoid extending main groups outside of curriculum requirements where possible.
- Plan and implement appropriate hand hygiene and disinfection arrangements.
- Where taking place indoors, use a room with as much space as possible, for example, larger rooms; rooms with high ceilings are excepted to enable dilution of aerosol transmission.
- Singing, wind and brass playing should not take place in larger groups such as choirs and ensembles, or assemblies unless significant space, natural airflow (at



## COVID-19 Compliance code for all educational settings

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least 10l/s/person for all present) and strict social distancing and mitigation as described above can be maintained. Where fresh air, air conditioning is in place this will normally run at this level as a minimum.

The balance of these measures should consider: pupil age, the space available; groupings and offering a broad curriculum.

For young children (under 10), incidental singing within bubbles normal class space is permitted, so long as it is for short periods, the space is well ventilated and staff are positioned to the side rather than face on.

Please note: Performances with live audiences are not recommended at this time.

### Handling items, equipment and instruments

- Equipment including microphones and instruments should not be shared wherever it is possible. Where they are shared the cleaning, handling and passing requirements for shared resources outlined in this compliance code must be applied. Instruments should be cleaned by the pupils playing them where possible.
- Avoid the use of costumes in drama.
- Where equipment is assigned to an individual for sole use it should be labelled to identify the user, for example, percussionists own sticks and mallets.
- Limit handling music scores, parts and scripts by issuing them for individual use.
- Hand hygiene must be performed before and after handling equipment.
- Consider limiting the number of suppliers when hiring equipment and agree responsibility for cleaning hired instruments with the supplier. Hired equipment must be cleaned before use and return.
- Ensure that equipment is stored in a clean location when it is not in use.
- Ensure that pick up and drop off points are provided for all items rather than passing them.

### Individual lessons

Individual lessons in music, dance and drama can resume. These may mean teachers interacting with pupils from multiple groups; care must be taken in line with the measures for peripatetic teachers and the measures above including those around considering ventilation and limiting sharing of equipment. Social distancing should be maintained as much as is possible; physical correction should not be provided.

### Physical activity

The measures of this compliance code apply to physical activity including: staff and pupil cohorting; distancing, hygiene and cleaning arrangements. These measures are particularly important for sports because of the way in which people breathe during exercise.





## COVID-19 Compliance code for all educational settings

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Sports whose national governing bodies have developed guidance under the principles of the government's guidance on team sport and been approved by the government are permitted. Schools must only provide team sports on the list available in the [return to recreational team sport framework](#).

Scrupulous attention must be given to cleaning and hygiene. Sports equipment and touch points must be thoroughly cleaned between each by group as outlined in the *Cleaning and Disinfection* section.

Outdoor sports should be prioritised where possible and where it is not the large indoor spaces used, maximising natural ventilation flows (see ventilation section). In addition:

- Arrange means for collecting, passing on and returning shared resources and equipment to prevent close contact
- Reduce or avoid the use of non-personal kit. Any non-personal kit e.g. bibs must be carefully cleaned between uses.

External facilities can also be used in line with guidance for the use of, and travel to and from those facilities. However, a risk assessment must be completed in advance and all the relevant sections of this compliance code considered as part of that. Schools should refer to the following advice:

- [guidance on the phased return of sport and recreation](#) and guidance from [Sport England](#) for grassroot sport
- advice from organisation such as the [Association for Physical Education](#) and the [Youth Sport Trust](#)

Schools are able to work with external coaches, clubs and organisations for curricular and extra-curricular activities where they are satisfied that this is safe to do so. Schools should consider carefully how such arrangements can operate within their wider protective measures (see also staffing).

Activities such as active miles, making break times and lessons active and encouraging active travel help enable pupils to be physically active while encouraging physical distancing.

The use of changing rooms and showering facilities should be avoided as much as is possible. Where they are needed, consider how you can limit use for example, allow PE Kit to be worn on arrival and for the whole day, or part of the day until after the lesson.

Moderations must be made to the changing facilities to ensure social distancing is maintained. This may include limiting the numbers using the space at any one time, use of floor markings, planning the management of movement around the space, additional cleaning arrangements etc. Users should use these facilities as quickly as possible.

## COVID-19 Compliance code for all educational settings

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Swimming Pools guidance is provided separately and should be referred to.

### *Subjects involving practical activities*

Modify curriculum activities including the way practical activities are carried out and the times they are delivered to support distancing and limit close contact. Particular attention should be paid to:

- Practicals and experiments should be reviewed for appropriateness in the light of the need to keep pupils distanced from each other. Particular thought should be paid to how the use of fume cupboards, Bunsen burners, sinks and other shared equipment/spaces can be managed to prevent close contact
- Settings should consider how they can undertake practical demonstrations without the need for pupils to congregate at the front of the class e.g. technology could be utilised to project the demonstration onto a smart board or screen to aid visibility
- For practical subjects e.g. Design Technology, it is not always safe to maintain social distancing. Therefore, smaller teaching groups should be employed. Where close contact activity is required this must be for the shortest time duration that is safe and practical, the teacher should position themselves next to rather than in front of the pupil, all parties should undertake hand hygiene before (where practical and this doesn't delay safety) and after the interaction.

CLEAPSS COVID-19 resources and advice, provide further information, for example:

- [Guide to doing practical work in Science](#)
- [Guide for science departments returning to school after an extended period of closure](#)
- [Guide for managing practical work in non-lab environments](#)
- [Guidance for schools where pupils spend all day in a lab](#)
- [Guidance for schools where pupils spend all day in a D&T, food or art room](#)
- [Primary schools should refer to the primary website for example, Practical activities in a bubble](#)

### *Supervised toothbrushing programmes*

- The Government have produced guidance on supervised toothbrushing which must be followed for this activity: [COVID-19: guidance for supervised toothbrushing programmes in early years and school settings](#)

## **Examinations**

Where exams are permitted to go ahead the principles of this compliance code must be applied including:

- Arrangements for arrival and departure of candidates ensuring they are kept separate from other pupils and remain socially distanced, considering arrival and departure to the setting as well as the examination room



## COVID-19 Compliance code for all educational settings

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- Provision of a suitable area where they can wait in a socially distanced way before being allowed into the exam room
- Hand and respiratory hygiene provisions
- Cleaning provisions both before and after exams take place
- The set up of the exam room to ensure seating is 2m apart (or 1.25m between pupils who are currently in an existing bubble together). The upper limit of the numbers that can occupy an exam room will be based on the ability to maintain these distances
- Maximising ventilation as much as possible
- Supervision of the exam. Invigilators can walk up and down aisles but when standing or sitting for a period of time this must be at a location where 2m distance from the nearest candidate can be maintained
- The requirements relating to face coverings that are in place in the setting at the time
- Protocols regarding resources e.g. how exam papers and other materials will be distributed and collected in a hygienic and safe way
- The provision of support staff where necessary and how this can be accommodated whilst maintaining 2 metre distance as much as is possible, where this is not possible taking other mitigating measures such as working side by side
- Protocols regarding anyone who needs to leave the exam room ensuring that supervising staff maintain 2m distance as much as is possible, where this is not possible taking other mitigating measures such as working side by side

All staff, pupils and invigilators involved in exams must be notified in advance of the arrangements in place to keep everyone safe and reminded that they must not attend the setting if they are displaying COVID-19 symptoms or are isolating.

Further information on preparations for exams can be found in the [government guidance](#) and COVID-19 Exams Checklist of measures is available on the Norfolk Schools and Infospace sites for your use.

### **Educational visits**

Educational Visits are not recommended at this time

### **Where a pupil attends more than one setting**

Where a child routinely attends more than one setting on a part time basis, for example because they are dual registered at a mainstream school and an alternative provision



## COVID-19 Compliance code for all educational settings

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setting or special school, schools should work together to ensure the approach is consistent and does not compromise the group/bubble.

### Extra-curricular provision and wraparound care

Extra-curricular and wraparound care is permissible where it is necessary to support parents to work, attend education and access medical care, and is as part of pupil's wider education and training.

Settings should advise parents that where they are accessing this provision for their children, that they must only be using this, where:

- the provision is being offered as part of the school's educational activities (including catch-up provision)
- the provision is as part of their child's efforts to obtain a regulated qualification or meet the entry requirements of an education institution
- the use of the provision is reasonably necessary to support them to work, seek work, undertake education or training, attend a medical appointment or address a medical need or attend a support group

From 29 March, and in line with when schools close for the Easter holidays, out-of-school settings and wraparound providers will also be able to offer outdoor provision to all children, without restrictions on the purpose for which they may attend.

A full opening up of wrap around care and extra-curricular activity will not be allowed until at least 12<sup>th</sup> April.

Schools should ensure that their provision follows the requirements of this compliance code and work closely with any external wraparound providers their pupils may use to ensure children can be kept in a group with other children from the same bubble they are in during the school day where possible. Schools should apply the following:

- Keep groups of no more than 15 children where they cannot be kept in their school bubbles and try to create groups on the basis of household groups (group sizes may need to be smaller than 15 depending on factors such as age, size of the premises and the type of activity).
- Social distancing should be maintained both within and between groups
- Consider providing activities outdoors as much as possible.
- Contact records must be maintained for all bubbles or groups for 21 days
- Activity safety, cleaning, hand sanitisation and waste requirements outlined in the compliance code must be applied to outdoor provision as well as indoor. Particular attention should be applied to touch points such as gates and handrails, providing hand sanitiser at suitable outside locations and the provision of waste facilities and tissues



## COVID-19 Compliance code for all educational settings

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- Access to and use of toilet facilities must be considered. In particular you should limit the number of children using the toilet at any one time, and, where possible avoid different groups using the same facilities at the same time.

Please note: multiple groups of 15 can use the same shared place, if necessary with distancing between the groups. Where this is the case, other protective measures in this compliance code must be stringently applied. Although, different groups sharing the same space should be avoided where possible.

Where parents use childcare providers or out of school activities for their children, schools should encourage them to seek assurance that the providers are carefully considering their own protective measures, and only use those providers that can demonstrate this. Schools should circulate the [guidance for parents and carers](#) to support their decision making

### Measures for arriving and leaving

Assessment must consider how to manage arriving and leaving the setting. Preference must be given to staggering times of arrival and leaving by adjusting start and finish in order to keep groups apart and avoiding rush hour (a staggered start and finish time should not reduce the amount of teaching time and you may need to condense free periods/break time in order to achieve this). Where settings rely on public transport or school transport services they may not be able to alter start and finish times as much as others (see below).

The following should be considered:

- Prevention of group mixing
- Implementing social distancing in busy transit routes
- Supervision at key times
- The impact of weather changes on safety arrangements e.g. management of queuing.
- Providing hand sanitiser stations outside for pupil and visitor use
- The management of reception areas, how social distancing and potential points of contact can be managed hygienically
- The management of deliveries to eliminate close contact e.g. having a pre-arranged drop off point, the delivery driver signing for you
- The way the site is used to reduce contact between site users and ensure other safety risks are not increased for example by changes in traffic management
- Using additional exits and entrancing to support cohorting and reducing mixing of groups
- Arrangements for young children to avoid parents entering the setting where possible including hand over at the threshold, using technology to provide an end of day report rather than meeting with parents etc
- Avoiding gatherings at school entrances during drop off and collection times through communicating arrangements with pupils, parents and carers.
- The use of bike racks
- Particular attention should be given to how the first day of term will be organised with both new and existing pupils supported to follow infection control requirements. You may wish to consider staggering the return to school by welcoming back different year groups/classes on different days to help everyone get used to the new way of operating.

Last reviewed on: 24 February 2021

Approved By: Health, Safety and Well-Being

Version number: 8



## COVID-19 Compliance code for all educational settings

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Please refer to PPE and face coverings section for information about face covering removal on arrival.

Please note: Additional precautions, other than handwashing as normal are not needed for handling post or packages, the risk associated with this is very low.

### Transport and travel

NCC is working with school transport providers to ensure they apply the principles of infection control to their services. Due to the geographical spread of catchment areas in Norfolk it is not possible to reorganise transport services to maintain setting groups/bubbles. This is permissible under the Government guidance and the other measures taken by services and settings will help to mitigate the risks.

It is therefore important that all pupils sanitise their hands before entering the setting. Settings are therefore required to provide sanitising stations and signage to encourage its use at each entrance. Settings may consider the additional measure of supervising entrances in the morning as appropriate to support this. Further information on sanitiser points is provided in hand cleaning and washing.

Please also refer to the face coverings section.

Schools should encourage parents, staff and pupils to walk or cycle to school if at all possible. For some families, driving children to school will also be an option.

Schools operating their own minibuses must ensure that:

- Transport is adequately ventilated
- Cleaning and disinfection arrangements are implemented, following the COVID-19 Cleaning and Disinfection Supplement
- Contact within groups and group mixing is avoided where possible
- Social distancing is implemented as much as is possible
- Face coverings are worn by anyone not exempt from doing so

### Visitors (including familiarisation and parents evenings)

Settings must continue to minimise the number of visitors to the setting and consider the time at which visits occur so that visitors are separated from staff and pupils. However, there should be no entry restrictions placed on visitors that are required for the purposes of education or safeguarding.

All visits should continue to be by appointment only so that you are able to inform them in advance of the arrangements for infection control including:

- Your expectation of them while they are on the site, which entrances and exits to use, vehicle movement and parking and how you will ensure their safety



## COVID-19 Compliance code for all educational settings

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- Any specific arrangements for example, areas of the premises that are suitable for use, and to not use spaces that are already occupied,
- How you will maintain social distancing during the visit
- Action to take if they cannot keep away from others
- To leave the setting immediately if they develop symptoms, not matter how mild.

Visitors must also be provided with further information on arrival and asked to perform hand hygiene before entering the site.

Records of visitors must be maintained for contact tracing requirements as described in the *managing cases guidance*.

In addition, any activity or provision where members of the public take part or make use of the setting must have a QR code available for checking in purposes. Settings are not required to have a QR code available for the provision of childcare or education, but where events are hosted this must be available.

### *Visiting professionals*

Specialists, therapists, clinicians and other support staff for pupils with SEND should provide interventions as usual.

### *Contractors and other visits not essential to education and safeguarding*

Where visits can happen outside of school hours, they should. Where contractor visits cannot take place outside of school hours e.g. because they cannot be rescheduled or are required to be carried out during the day, an assessment of how social distancing will be maintained must be carried out and agreed in advance.

### *Pupil familiarisations visits*

Where possible, familiarization should be provided virtually. Where in person premises visits are planned, the general requirements for visitors that are outlined in this section apply, this includes ensuring that visitor numbers are limited and appointments are staggered. If they can take place outside the school day without detriment to the purpose of the visit, they should.

Where pupils attend lessons as part of familiarisation, the principles for extending groups will apply and must be planned to:

- Limit visiting pupils mixing between additional groups
- Limit the number of different visiting pupils from joining at the same time, with at least a 48 hour period between different pupils joining
- Avoid compromising the existing social distancing arrangements within the class
- Consider the wider implications for increased use of the premises
- Ensure that the pupil involved and their parents understand the arrangements that are in place to reduce the risk.

### *Parent meetings (including parent evenings)*



## **COVID-19 Compliance code for all educational settings**

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All parent meetings should be carried out remotely where possible.

Where on-site meetings are required these should be by pre-arranged appointment to support the visit to be organised and managed in accordance with the requirements. Consideration must be given to the location of the meeting, how it will be managed and who will attend in line with infection control requirements. Where possible, only one parent/carer should attend.

All meetings must be managed in line with the requirements detailed under internal meetings and events.

### **Movement around the premises**

Passing each other briefly in corridors is not a close contact event, however, the movement of groups should be planned in order to avoid group gathering/mixing. This should include staggering movement times, providing alternative routes (such as outside areas), alternative entrances and exits, one-way circulation and central dividers where appropriate.

Lifts should not be shared, unless the person using the lift requires support. For this reason, lifts should be prioritised to those people who are not able to use the stairs. The use of posters to encourage this may be helpful. Hand sanitiser must be provided for use before and after touching lift controls.

### **Lunchtime and Breaks**

The way in which lunch provision is organised must be considered in order to not compromise groups or distancing requirements and prevent pupils congregating together. Recognising that available space may cause difficulties, consideration should be given to the other spaces available for lunch provision, including classrooms. The use of pre ordering and trolley services should also be considered.

Where you cannot stagger the times of use between groups or use alternative space larger spaces can be partitioned for use by more than one group. Consideration must be given to how the groups will enter and leave the room without compromising the groups.

Distancing should be maintained at lunch times by moving tables and chairs apart. Consideration should be given to how groups will move around the school to access facilities. Separate entrance and exists could be used to facilitate this, or the use of one-way systems.

Staff must continue to apply social distancing within their grouping and not gather with other groups during breaks. The staff areas used for taking breaks must be staggered to prevent group mixing or consideration can be given to using other spaces as staff rooms. Social distancing must still take place during these times and furniture should be arranged to support this. Touch points should be wiped down between use by different groups.

Other considerations include:





## COVID-19 Compliance code for all educational settings

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- Identification of suitable play activities for break times to support distancing
- How pupils will leave class and break spaces to ensure distancing is maintained
- Applying marking to outside spaces to assist with queues coming back into the building
- Providing additional staff supervision during break times

### *Catering*

Normal legal requirements will apply about provision of food to all pupils who want it. Arrangements must comply with [guidance for food businesses on coronavirus \(COVID-19\)](#).

Where catering services are contracted, the school must ensure that their activities are COVID-19 secure and consider additional aspects such as:

- how essential deliveries are received at the setting
- assessing how food is collected by pupils.

Where the setting provides this service directly, they must assess this activity in line with those requirements.

### **Ventilation**

#### *Increasing ventilation*

You should consider how to increase ventilation and air flow in buildings and schools operated transport to ensure that a fresh air supply is consistently flowing through. Consideration should be given to:

- Opening doors and windows where possible and safe to do so.
- Installing alarm activated door openers to keep fire doors open and encourage air flow. Where you do not have an electrical supply near doors you may be able to install wireless operated openers.
- Where installed, reviewing the setup of your air conditioning system to maximise the intake of fresh air. Fresh air ventilation systems can operate as normal, but recirculating air systems may require adjustments to increase fresh air flow.
- Where systems serve multiple buildings or are fully recirculating, advice should be sought from HVAC engineers.

In the autumn and winter to ensure thermal comfort is balanced with the need for ventilation a number of practical steps can be taken including:

- Fully open windows before classrooms are occupied and during breaks but keep them only partially open during lessons



## COVID-19 Compliance code for all educational settings

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- Fully opening some windows to gain air changes but selecting those that are not directly next to pupil's desks/work areas or opening high level windows fully but lower level windows partially
- Make sure everyone is dressing appropriately for the cooler weather, for example encouraging the use of long sleeves, thick tights and jumpers and allowing pupils to wear their coats in the classroom if appropriate

Ensure that ventilation systems are maintained, following manufacturers instruction

### *Spaces without appropriate ventilation*

In rooms and zones where there is no direct supply of outside air then consideration should be given to prohibiting access to these spaces by building users, especially where it is likely that they would be occupying such a space for considerable lengths of time (longer than 30 minutes). This may include internal rooms (rooms within rooms), basement rooms or storage areas which rely on infiltration of air from other spaces.

### *The use of fans*

There is no current research to suggest that fans aid transmission of COVID-19 but some staff may be concerned about their use. However, for some individuals, fans are important to aid body temperature regulation. It is therefore, recommended that if anyone wishes to use a fan in a shared space that discussion takes place with the staff who also use that space. Where fans are needed in classrooms and other educational areas a decision should be made by the Headteacher in conjunction with staff. Where it would help to alleviate concern, they can be placed near to an open window to draw in fresh air, where windows can be opened and/or they can be placed close to the individual user to ensure they don't create nuisance draft to others.

## **Toilets and handwashing facilities**

You will not need any additional toilet facilities to support infection control. You must however consider how you will manage toilet facilities to reduce mixing of groups, the formation of queues (unless distancing is in place), pupils gathering etc. Pupils should be informed on the expectation on the use of toilet spaces including giving other people space at urinals and wash hand basins. You may find the use of floor markings and signage useful prompts. The times of use should be staggered where possible.

Settings should review the facilities available for hand washing and drying:

- In order to reduce contact points consideration should be given to replacing traditional taps with easy operating lever taps.
- Hand dryers should enable people to dry their hands quickly, fully and effectively. Where this is not the case consideration should be given to replacing dryers or providing paper towels. Settings could consider staggering such improvements where time and resources are limited.



## COVID-19 Compliance code for all educational settings

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### Personal protective equipment (PPE)

The majority of staff in education settings will not need additional PPE beyond what would normally be worn. PPE will be required in a small number of cases, where:

- a pupil becomes ill with symptoms at the setting, and a distance of 2 metres cannot be maintained
- first aid is being provided in close contact

Please refer to the detailed guidance on Personal Protective Equipment for further details on what is required when and how to put on and remove PPE safely.

### Face coverings

Face coverings can help contain any droplets you produce and therefore when worn correctly in certain circumstances, they may reduce the possibility of you transmitting COVID-19 to other people. A face covering is not Personal Protective Equipment (PPE) and they are not intended to protect the wearer. They are not therefore intended to replace social distancing, or personal hygiene (regular hand washing for 20 seconds and following catch it, bin it, kill it advice); the measures that when combined are the most effective means of limiting the spread of the virus. It is very important that even when you wear a face covering you remain vigilant and continue with these measures. Multi layered face coverings are considered to be most effective.

It is also important to remember, if you have any symptoms of COVID-19 (a new persistent cough, a high temperature or a loss/change to your sense of taste or smell), no matter how mild, you should self-isolate and seek to get tested. Wearing a face covering does not make it safe to go out in the community or to work if you have COVID-19. Wearing a face covering will also not exempt you from the requirement to self-isolate if you are a close contact of someone who tests positive.

However, it is recognised that in some settings, despite all best endeavours, it is not always possible to maintain 2m distance and therefore wearing a face covering is now required in a number of circumstances:

- When using public transport
- When visiting a hospital
- When visiting a number of enclosed public places including retail, consumer services and visitor attractions
- In Secondary and Further Education establishments in particular circumstances

are taking to limit direct contact, improve environmental cleaning, increase personal hygiene and ensure areas are well ventilated, are designed to keep everyone safe.

### Secondary schools and colleges



## COVID-19 Compliance code for all educational settings

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Face coverings should be worn by adults and pupils when moving around the premises, outside of classrooms, such as in corridors and communal areas where social distancing cannot easily be maintained.

Until further notice (and at least until Easter) face coverings should also be worn in classrooms or during activities unless social distancing can be maintained. This does not apply in situations where wearing a face covering would impact on the ability to take part in exercise or strenuous activity, for example in PE lessons.

Face coverings do not need to be worn by pupils when outdoors on the premises.

### Primary Schools

In primary schools, face coverings should be worn by staff and adult visitors in situations where social distancing between adults is not possible (for example, when moving around in corridors and communal areas).

Children in primary school do not need to wear a face covering.

The use of face coverings:

- Should not replace the measures outlined in the compliance code which reduce the risk of virus transmission.
- Must be managed in a hygienic way to reduce the risk of contamination and transmission. Where homemade non-disposable face coverings are used the wearer must store these, folded in on themselves in a plastic bag when not in use. Anyone wearing a face covering must be able to put it on and take it off safely themselves.

Face visors or shields should not be worn as an alternative to face coverings. They may protect against droplet spread in specific circumstances but are unlikely to be effective in reducing aerosol transmission when used without an additional face covering.

Settings should provide users of face coverings with information on how to put on and take off a face covering safely as follows:

1. wash your hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and after removing it
2. make sure it covers your nose and mouth while allowing you to breathe comfortably
3. when wearing a face covering, avoid touching your face or face covering, as you could transfer the virus to or from it
4. avoid wearing it around your neck or on your forehead between use
5. when you take your face covering off, be careful not to touch the front or inside of it, fold it in on itself and store safely in a bag between wears or before washing

## COVID-19 Compliance code for all educational settings

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6. change your face covering if it becomes damp, damaged or if you've touched it (as face coverings are used for longer in some settings consideration should be given to instructing students and staff to bring more than one covering to setting so they can change regularly)
7. change and wash reusable face coverings daily in line with manufacturer's instructions (more than one covering may be needed as above)
8. if it's not washable, dispose of it carefully in your usual waste
9. do not share your face covering with someone else

Secondary schools and colleges may wish to have a small stock of disposable face coverings available to offer to students that are struggling to access these, where they may have forgotten their own or need to replace it during the day. Settings can purchase disposable face coverings (also known as surgical face masks) from NCC through the [PPE purchasing route](#). Please note these cannot be used in circumstances where PPE is required as they do not meet the standards for PPE but are suitable as face coverings.

Please note, for some people it would not be appropriate for them or you to wear a face covering, for example where it would cause distress or exacerbate a health condition or where they rely on lip reading, facial expressions and clear sound to communicate.

### 4.3 Universal hygiene

Universal hygiene measures consist of 3 main elements: cleaning and disinfection of the setting, equipment and items; hand cleaning and washing arrangements; and respiratory hygiene arrangements.

#### Cleaning and disinfection

Cleaning	A process that physically removes contamination using detergent (such as visible dirt) this helps to remove germs (bacteria and viruses) so lowers the number of germs on a surface but does not necessarily kill them.
Disinfection	A process that kills germs on the surface they touch. To be effective disinfectant needs to be used on a clean surface unless it is a combined product. Disinfectants have a calculated <b>contact time</b> . This is the time it takes for the disinfectant to be effective at a particular concentration. There are a number of different active ingredients in disinfectants but chlorine based disinfectants are known to be highly effective for the majority of germs.
Sanitiser	Sanitisers have combined cleaning and disinfecting properties. They need to be used twice, firstly to clean and then to disinfect.
Deep clean	This term is often used to describe a more thorough cleaning and disinfection regime, where all contact surfaces and soft furnishings are both cleaned and disinfected. Deep cleans are

**COVID-19 Compliance code for all educational settings**

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	usually associated with outbreaks of infectious diseases associated with a particular location and help break the cycle of the infection.
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The enhanced cleaning and disinfection routine you implemented during the summer term will need to continue into the autumn term. Noting that COVID-19 can spread by picking up the virus from hand contact surfaces, this enhanced regime will be an important part of your infection control strategy. This will include the need to continue to clean equipment and resources more than prior to the COVID-19 outbreak.

As babies and young children are not be able to follow all of the handwashing and personal hygiene measures (keeping hands away from face and others), and physical distancing is not possible with this group, relevant settings will need to pay particular attention to cleaning and disinfection. Cleaning and disinfection in these settings will need to occur more frequently (several times a day) with particular regard to hand contact surfaces.

Similarly, in secondary settings, where the ability to maintain small groups is more difficult, and children are likely to move around the setting much more than in primary settings, ensuring hand contact surfaces are cleaned regularly throughout the day will be important. Teaching staff should be provided with disinfectant wipes to enable them to clean contact points in their classrooms between groups/classes. Desks and chairs should be disinfected between use by different pupils.

Staff who carry out general cleaning roles should be assured that they are not at any increased risk while they are undertaking their general duties wearing their normal personal protective equipment. The following principles apply:

- Always follow the instructions for cleaning products and disinfectants to ensure it is effective It is important to ensure that all of the surface has disinfectant applied and not to wipe items dry before the required contact time has been achieved.
- All touch points that are fixed to the premises (inside and out) should be identified and disinfected on a twice daily basis (more frequently for Early Years settings) (for example: door handles, handrails, gate latches), consider areas were you may wish to clean more frequently, for example, where pupils may find it difficult to maintain personal hygiene, toilet facilities and frequently touch shared items on the premises.
- Ensure that you have a system in place to store used equipment prior to cleaning in order to avoid inadvertent use between groups.
- If a surface is visibly dirty it should always be cleaned prior to disinfection. Even where you use a dual product as described in the appendix.
- The setting will need to identify the specific cleaning methods for the items that require cleaning.
- Use disinfecting wipes on items that are touched often, you may need to go over them more than once to ensure the contact time is achieved.



## COVID-19 Compliance code for all educational settings

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- Ensure that you are using different cleaning equipment for kitchens, toilets, classrooms and office areas.
- Where water coolers and drinking water is provided from a shared source, use must be supervised and the outlet wiped by a staff member between filling receptacles in order to reduce the risk of cross contamination between filling. You may need to relocate these to an area where they can be easily supervised and manage their use to avoid gathering in this area.

The COVID-19 Cleaning and disinfection – supplementary information for educational resources and equipment checklist details specific requirements for cleaning of items and should be completed as part of your review to ensure that your arrangements are suitable.

### ***Foggers, UV devices and misters***

There are a number of products on the market that make claims regarding disinfection of whole rooms through the application of the active ingredient via a fogger or misting unit, or by application of UV light. Whilst these products can be used to compliment your cleaning and disinfection regime they must not be used as the sole means of cleaning and disinfection. It is important to remember:

- The active ingredient is only effective on the surfaces it touches and therefore such devices are most effective when used in an empty space
- A surface is only as clean as the last time it was touched
- Disinfectants are only effective on a visibly clean surface
- In some cases the room will need to be left to ventilate for some time after application of the product
- Some applications will need to be applied by a person trained in their use
- UV light unit effectiveness will be impacted by shadows

Public Health England do not currently recommend the use of these products in their guidance.

### **Handwashing/cleaning arrangements**

Keeping hands clean through regular and through washing or sanitising is one of the key elements of the universal hygiene measures that are designed to limit the spread of the virus.

Research has shown that every time you wash your hands or use sanitiser you reduce the probability of transmission of the virus. If, despite implementing thorough cleaning regimes, you pick up the virus on your hands, or you have the virus and cough or sneeze into your hands, regular hand washing will reduce the likelihood of you becoming infected or passing on the infection. Handwashing therefore protects you and your friends, family and colleagues. The easier it is to clean your hands and the more visual cues available the more likely it is that people will do this. Event related prompts e.g. *after...before...when...* are more effective than fixed time prompts. Therefore settings must install hand sanitiser points (with drip trays to deal with spillages and prevent slip risk where this is applicable



## COVID-19 Compliance code for all educational settings

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e.g. if they are affixed to walls) at key locations around the site including: at all entrance doors to the setting, at the entrance to toilet facilities, at the entrance to dining facilities, at points of high contact such as near non-automatic doors in corridors, lifts and stairs, classrooms, office facilities etc. Consideration should be given to outside points being provided in a manner that enables removal and securing at the end of the day e.g. on tables/temporary or movable stands etc. To support infection control and reduce the transmission risk you must ensure that:

- Effective and thorough handwashing arrangements are in place, considering age and individual needs.
- Hand washing is carried out using running water with liquid soap. Hand dryers or paper towels can be used to dry hands. Hand dryers must be effective in quick hand drying. Where current provision does not support this consideration to replacing existing dryers with improved models or hand towels must be given
- Where hand washing cannot be carried out using running water, hand sanitiser is used.
- Hand sanitiser is provided at appropriate locations as outlined above
- Hand hygiene is carried out more frequently than normal using event related prompts where it is possible including: before and after using transport services, on arrival at the setting, after removing a face covering prior to leaving, before and after eating, after going to the toilet, after sneezing or coughing and at other intervals where it is appropriate such as after using equipment, before and after handling pupils books, using play equipment and resources. Staff and pupils must also be advised to wash their hands when they get home.

Please note: you may wish to advise staff and pupils to avoid wearing rings (except for a plain band) in order to ensure thorough handwashing. Where children are not able to wash their hands due to age or health conditions ensure you have a good supply of skin friendly cleaning wipes such as baby wipes to use as an alternative.

### *Hand sanitiser*

Hand sanitiser is recommended for use where hand washing facilities are not available at available at the location where hand hygiene is required. Your assessment should identify where hand sanitiser should be located and used as described above for example in dining areas, entrances to buildings and areas where activities are carried out where sinks are not easily accessible.

Where the provision of sanitiser points presents a risk of ingestion e.g. due to health conditions of some pupils this must be managed through supervision of pupils. If that is not possible and significant risks remain please discuss alternatives with Health, Safety and Well-being.

The following link provides a recommended hand rub method: [How to hand rub](#)





## COVID-19 Compliance code for all educational settings

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Everyone who uses alcohol-based sanitiser must be instructed to ensure that it is completely dry on hands before going near to ignition sources or touching any metal surfaces.

### Respiratory hygiene arrangements

In order to support good respiratory hygiene settings should install bins in all rooms and provide tissues for everyone to use.

Everyone should be reminded of the need and encouraged to follow good hygiene practices:

- [Catch it, Kill it, Bin it](#) - Covering your mouth and nose with a tissue or sleeve when sneezing and put used tissues in the bin straight away. Always wash your hands afterwards
- Minimise touching hand contact surfaces with your hands as far as is reasonable and safe to do so.
- Avoid touching the eyes, nose or mouth if you haven't washed your hands.
- Regular and thorough hand washing as outlined above

### Washing and laundry

Pupil uniforms and staff clothing do not need to be cleaned any more often or by using any different methods than usual.

### Specific equipment required

The additional equipment needed to implement the hygiene requirement includes:

- Increased supplies of liquid soap, disposable paper towels (if already used)
- Hand sanitiser (and appropriate dispensers)
- Increased cleaning and disinfectant products
- Disinfectant wipes
- Additional bins where needed to dispose of tissues. Please note: the use of open bins will reduce touch points and are more accessible than foot operated or pedal bins

## 4.4 Health, Well-Being and attendance

### Pupils

The majority of pupils who have been shielding or have underlying health conditions will be able to return to school. A small number of pupils will still be unable to attend in line with public health advice because they are self-isolating and have had symptoms or a positive test result themselves or because they are a close contact of someone who has coronavirus (COVID-19).

[New advice](#) has been made available for a very small group of children that continue to be deemed extremely clinically vulnerable and have been informed of this by letter (further information on these children is available [here](#)). In the main, these children can continue to



## COVID-19 Compliance code for all educational settings

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attend school, although a different approach may apply if rates of the disease rise in local areas. Children that remain in the clinically extremely vulnerable category from that area may be advised to shield during the period where rates are very high and therefore, they may be temporarily absent.

All other pupils must attend school. Schools should bear in mind the potential concerns of pupils, parents and households who may be reluctant or anxious about returning and put the right support in place to address this. This may include pupils who have themselves been shielding previously but have been advised that this is no longer necessary, those living in households where someone is clinically vulnerable, or those concerned about the comparatively increased risk from COVID-19, including those from Black, Asian and Minority Ethnic (BAME) backgrounds or who have certain conditions such as obesity and diabetes.

If parents of pupils with significant risk factors are concerned, we recommend schools discuss their concerns and provide reassurance of the measures they are putting in place to reduce the risk in school. Schools should be clear with parents that pupils of compulsory school age must be in school unless a statutory reason applies (for example, the pupil has been granted a leave of absence, is unable to attend because of sickness, is absent for a necessary religious observance etc).

Where pupils are absent because they remain at significant risk, they are required to isolate or due to increased alert level measures settings are expected to continue to provide remote education.

### ***Identifying pupils who have symptoms***

PHE advise that parents/carers and schools **do not** need to take children's temperatures before or during school. A high temperature is only one symptom of the virus and can be a symptom of many illnesses, not everyone will get a temperature and temperature can be affected by medication. It is therefore not an effective means of identifying everyone who is infected. However, it may be useful where pupils are not able to communicate their symptoms, or where due to underlying health conditions they display different signs of illness. Staff must:

- Ensure that pupils know how to tell a member of staff if they feel unwell and specifically with the main symptoms of COVID-19 (no matter how mild) so that staff can arrange for them to go home as soon as possible
- Be vigilant in order to respond in the event that a pupil develops symptoms
- Be aware of the signs of illness that might be displayed in pupils that cannot communicate if they are feeling unwell (see below)
- Ask pupils about their health when they arrive at the school
- Self-isolate if they or a member of their direct household has any of the main symptoms (a new, continuous cough, high temperature/fever and/or a loss or change of your sense of smell).



## COVID-19 Compliance code for all educational settings

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- Go home if they develop symptoms, not matter how mild. Follow the COVID-19 testing and rapid response arrangements

### **Pupil well-being and support**

Pupils may be experiencing a variety of emotions in response to the COVID-19 pandemic, such as anxiety, stress or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. It is important to contextualise these feelings as normal responses to an abnormal situation. Some may need support to re-adjust to school; others may have enjoyed being at home and be reluctant to return; a few may be showing signs of more severe anxiety or depression. Others will not be experiencing any challenges and will be keen and ready to return to school.

The training module on [teaching about mental wellbeing](#), which has been developed with clinical experts and schools, will improve teacher confidence in talking and teaching about mental health and wellbeing in the classroom. .

Guide students on how to support their peers and prevent exclusion and bullying. Work with your existing resources to identify and support students who exhibit signs of distress.

Manage behaviour as you normally would in order to encourage universal hygiene with pupils and new safety arrangements.

If safeguarding issues come to light they should be addressed using the school's safeguarding policy, which may need to be updated in light of wider opening. Headteachers should consider how they might manage any increase in referrals as pupils return to school.

Further considerations and links to resources are available in the [Government guidance here](#)

### ***Individual support planning (including for close contact tasks)***

A review of supportive actions may be required for a number of reasons such as:

- Where pupils cannot follow strict hygiene practices
- Pupils display behaviours that are challenging to manage in the current context, such as spitting uncontrollably
- Pupils may be less able to report symptoms
- The impact on the pupil due to unfamiliar or less familiar staff supporting them and routines being inconsistent and different to usual school routines
- Intimate care needs
- Providing moving and handling support

Please refer to: [Guidance to support positive behaviour](#) where it applies.

## COVID-19 Compliance code for all educational settings

---

### ***Where pupils are less able to report symptoms***

Where pupils are less able to report symptoms, staff should consider observable changes from the pupil being their usual self; consider also their usual responses to situations, which may be a sign of being unwell (where they are different to the norm) such as:

- Increased tiredness
- Loss of appetite
- Sweating
- Behaviours that challenge
- Laughing or crying
- Trying to hurt themselves
- Becoming withdrawn or quiet
- Use preferred methods of communication available such as signing and picture cues
- Where you identify that symptoms may not be obvious, consider temperature assessments, these may assist to establish symptoms where a pupil may be less able to report them ( $\geq 37.8^{\circ}\text{C}$  is considered a fever)
- Increase the support provided to pupils to increase the frequency and thoroughness of effective handwashing
- Put in place safe routines for access to toilets, hand-washing, break and lunch times
- Use simple language to explain social distancing and reiterate and reinforce key messages using teaching resources to aid understanding
- Ensure that levels of personal protection are increased, e.g. increased handwashing before and after planned close contact and review any specific increased touch point disinfection requirements.

### ***Aerosol Generating Procedures (AGP)***

Some procedures increase the risk of transmission through aerosols, such as for pupils receiving tracheostomy care.

AGPs that are commonly performed in education and children's social care settings include:

- non-invasive ventilation (NIV)
- bi-level positive airway pressure ventilation (BiPAP)
- continuous positive airway pressure ventilation (CPAP)
- respiratory tract suctioning beyond the oro-pharynx

These activities require a specific risk assessment supported by the young person's health professional. Separate guidance on AGPs, accessing the correct PPE and training for that is available on the Norfolk Schools and Infospace sites.

Procedures that are not classed AGPs include:

- oral or nasal suction
- the administration of nebulised saline, medication or drugs
- chest compressions or defibrillation



## COVID-19 Compliance code for all educational settings

---

- chest physiotherapy
- the administration of oxygen therapy
- suctioning as part of a closed system circuit
- nasogastric tube insertion and feeding

However, considerations for close contact still apply to these procedures as detailed in this document and where relevant the guidance on first aid provision.

### Staff Health and Well-Being

#### *Specific information for staff*

Please refer to COVID-19 Your health and your safety in Educational Settings for the following guidance:

- Staff health and increased risk groups
- Staff well-being
- Reasonable adjustments

#### *Asymptomatic Testing*

Coronavirus (COVID-19) asymptomatic rapid testing in settings using Lateral Flow Devices (LFD)s will support settings to be open for all by helping to identify people who are infectious but do not have any coronavirus (COVID-19) symptoms.

The asymptomatic testing programme does not:

- replace the current testing policy for those with symptoms. Anyone with symptoms (even if they recently had a negative test result), should still self-isolate immediately following government guidelines. Those with symptoms are also expected to order a test online or visit a test site to take a lab-based polymerase chain reaction (PCR) test to check if they have the virus.
- Change the need to rigorously follow the control measures that schools have already put in place.

Testing is voluntary. Pupils not undergoing testing should attend school in line with phased return arrangements.

Individuals with a positive test result will need to self isolate (and may be required to undertake a confirmatory PCR test depending on the circumstances of the LFD test and the rules in place at the time) in line with national guidance and schools should follow this guidance. A negative result means that attending school can continue (unless they are required to isolate for other identified reasons).

Separate guidance on this testing, when and how it should be used as well as template risks assessments are available on the [Norfolk Schools site](#)

### **4.5 Communication and Involvement**

## COVID-19 Compliance code for all educational settings

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Arrangements must be put in place to ensure communication and collaboration between pupils, staff, staff representatives (e.g. unions) and parents. These should be formally planned and publicised. Involvement in this way will help to secure their support for the measures you are taking both inside and outside the setting. Staff engagement is key to achieving a positive outcome, early involvement and influence in the development of the risk assessment is strongly advised.

Settings should consider publishing their risk assessment on the school's website.

### Information for parents and carers (and pupils where age appropriate)

Settings should communicate:

- What to expect on their first day of the new school year, this should include which entrance to use, where to go, the use of hand sanitiser on entering the site, how to move around the setting, instruction to go directly to their class, etc. Particular consideration should be given to pupils new to the school, pupils arriving on site early etc.
- How they can help and support the measures both inside and outside the setting e.g. through hand hygiene and social distancing; how to arrangement meetings and additional information in relation to the revised behaviour policy.
- That clothing can be handled and washed as normal.
- The school's arrangements regarding face coverings.
- Pupils should limit the amount of equipment they bring into school each day, to essentials such as lunch boxes, hats, coats, books, stationery and mobile phones. Bags are allowed.
- That they must not share personal items such as mobile phones with other pupils
- Pupils can take books and other shared resources home, these will be limited and measures will be put in place to make sure they are not a source of transmission before other groups use them
- That they are encouraged to limit the number of other settings attended, ideally ensuring they only attend one consistently and try to use those that are local and to walk or cycle where possible.
- They are encouraged that where they do use childcare providers or out of school activities, that providers are carefully considering their own protective measures, and only use providers that can demonstrate this. As with physical activity during the school day, only sports that have an agreed safe system should take place (see [return to recreational team sport framework](#).) and activities should be arrange so as not to encourage shouting, loud singing or chanting and performance arts are managed in accordance with the guidance.
- That they should encourage hand washing and respiratory hygiene at all times.
- To ensure that pupils are aware of the symptoms and not come to school if they develop them.
- To ensure that their contact details are kept up to date in order to keep in touch easily and to support test and trace.

## **COVID-19 Compliance code for all educational settings**

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- That they must collect their child promptly if any member of their household develops symptoms (and notify the setting as soon as they are made aware of this) or if they are called to collect their child
- That they will be advised by the school about testing arrangements, where it is required and are encouraged to share test results as soon as they are known.
- That they may be provided with a home test kit by the school.
- That children may be asked to isolate if a member of their group tests positive for COVID-19 and they are within the same main or extended group or have otherwise been identified as a close contact
- The actions that the school may take in the event of an outbreak.

Please use the template letter Communicating arrangements with parents and parent engagement (Primary and Early Years or Secondary Settings).

### **Information, instruction and training**

Managers must ensure that staff are provided with adequate information, instruction and training in order to carry out their role safely.

Managers should ensure that staff are confident and understand the measures that are being applied through discussion with them. Ensure that the following principles are included together with additional information relating to new safe systems of work:

- Actions for staff to take if they develop symptoms, household isolation, test and trace including asking them to notify the setting about their test results as soon as possible
- Actions for staff to take in order to establish that their pupils are well on arrival and to observe/ask during the day.
- Hand hygiene, the frequency required and how to prompt and support pupils
- Use the “catch it, bin it, kill it” approach.
- Avoid touching their mouth, nose and eyes, keeping their arms by their sides where possible.
- Staff will be provided with disinfectant wipes and will be encouraged to clean frequently touched surfaces regularly on top of the additional formal cleaning that is in place.
- Modifying the teaching approach to keep a distance from children in the class as much as possible, particularly close face to face support (noting that it is understood that this is not possible at all times, which is why hygiene and hand cleaning is so important).
- Adopting a side by side approach where close contact is required
- Avoiding calling pupils to the front of the class or going to their desk to check on their work as much as possible.
- Helping the class to follow the rules on hand cleaning, not touching their faces, “catch it, bin it, kill it etc. including by updating classrooms displays with posters.
- Pupils should be provided with their own resources for frequently used items like stationary.
- Keep classroom doors and windows open if possible and safe to increase ventilation.



## COVID-19 Compliance code for all educational settings

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- Limiting the number of children from the class from using the toilet at any one time.
- Limit contact with other staff members, not congregating in shared spaces, outside of their grouping
- Understanding the new behaviour policy and their responsibilities

Meetings should be held online before wider opening of the school in order to instruct staff about the new arrangements.

Please note: Particular attention should be paid to new/inexperienced staff, trainees and those with additional **significant** role changes.

Signs and marking should be used throughout the site to support the measures being taken and provide visual cues

### Behaviour expectations and Policy

Schools should set out clearly at the earliest opportunity the consequences for poor behaviour and deliberately breaking the rules and how they will enforce those rules including any sanctions.

Schools should update their behaviour policy with new rules/policies, setting clear, reasonable and proportionate expectations of pupil behaviour. This should be communicated in the normal way.

### Internal meetings and events

Every interaction with other people increases the possibility of transmission of COVID-19. In educational settings the maintenance of groups and bubbles is important to reducing this risk. Therefore, when planning meetings and events such as staff training, meeting with external professionals, internal staff meetings or meeting with parents etc you must conduct them remotely through use of TEAMS or Zoom as much as possible. If this is not possible due to:

- The need to be in person for safeguarding, staff or pupil well-being or statutory reasons or
- Limitations of technology, poor or unstable signal

Mitigating measures must be implemented including:

- The people meeting in person must be the smallest number necessary to enable the meeting or event to take place and consideration must be given to existing group or bubble working. All other participants must connect via technology.
- Only the elements of the meeting or event that need to be conducted in person are undertaken in this way, other elements are conducted remotely e.g. first aid training is delivered in a blended way with theory elements delivered on TEAMS or via online resources and practical exercises and testing of competence is undertaken in person





## **COVID-19 Compliance code for all educational settings**

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- The in person element of the meeting or event must take place outdoors unless for reasons of confidentiality, the need to use technology or equipment in a building, or weather conditions, this is not possible
- Where the use of an office base is needed to improve online stability for an individual or a number of participants, they must occupy separate office space or rooms where possible and available and the meeting continue to be conducted in a remote way
- 2m distance must be maintained between all participants at all times
- Participants must not directly face each other
- Activities must not require or encourage people to raise their voices or shout as this increases the risk of aerosol transmission
- Consideration must be given to meeting etiquette to maintain distancing e.g. when meeting indoors leaving the room in single file starting with the person nearest the door first.
- All meeting participants must practice good hand and respiratory hygiene before, during and after the meeting.

Agreement for in person meetings must be sought from your Headteacher. Headteachers must satisfy themselves that all reasonable mitigating measures have been implemented.

### **Championing COVID-19 measures**

Schools may consider appointing Social Distancing and Universal Hygiene Champions to assist with promoting and reinforcing their requirements where it is age appropriate for them. This is a really positive way to involve pupils in the school measures. Pupils who carry out these new roles should be provided with areas of responsibility, for example, reminding fellow pupils about handwashing, encouraging pupils to follow new school arrangements for queuing.

Schools must ensure that any pupil who carries out these tasks understand the arrangements and why they are important in order to promote them effectively.

### **Education Tools**

Age appropriate education will encourage pupils to become advocates for disease prevention and control at home, in school, and in their community by talking to others about how to prevent the spread of viruses.

Teachers and other staff should use age and developmentally appropriate ways to encourage pupils to follow social distancing, increased hand washing and information about developing symptoms.

PHE has a suite of materials that contains public health advice about how you can help stop the spread of viruses, like those that cause coronavirus (COVID-19), by practising good respiratory and hand hygiene. To access, download and share this information, you will need to register for an account. You can also use:



## COVID-19 Compliance code for all educational settings

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- [e-Bug](#) resources to teach pupils about hygiene.
- the resources available under communication on the [health, safety and well-being landing pages](#)
- the [Coronavirus Toolkit for Professionals](#) which contains campaign materials.

Only use information to educate pupils from trusted sources such as [HR InfoSpace](#) or [Norfolk Schools](#) (which both contain the same COVID-19 information) and [Public Health England](#) in addition to reinforcing your existing educational approach to understanding infection control.

### **4.6 Responding to infection**

Information on requirements to prepare and respond to a symptomatic person, a positive case or a number of cases is provided in the guidance on COVID-19 *Management of Cases Guidance*

### **4.7 Offices and other work spaces**

Where staff cannot work from home (either on a full or part time basis) social distancing (2 metres) must be followed (you will need to take measurements). In addition, the following measures must be put in place:

- Face to face working must be avoided
- Furniture must be rearranged to prevent face to face working and create separation to enable distancing of staff. Alternatively, areas could be clearly marked as not to be used
- Rooms must be well ventilated (see section on ventilation)
- Staff must be cohorted in consistent working groups
- Unnecessary items must be removed to support effective cleaning of the area
- Hot desking must be avoided

Where these measures cannot be applied:

- additional work spaces should be allocated
- sharing of workspace must be minimised and workspaces must be thoroughly cleaned between users.
- Consideration must be given to individual risk assessments when considering who occupies different workspaces and shared facilities

The installation of screens must be put in as a last resort as they are less effective than physical distancing, this is because:

- employees will still need to circulate around these spaces in close proximity with each other
- human behaviour is to move around physical barriers in order to communicate,
- and screens add to the environmental cleaning requirements



## **COVID-19 Compliance code for all educational settings**

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Assessments should ensure that desks in areas that are next to busy circulation spaces and shared equipment is not used. Shared equipment may need to be moved to reduce group mixing e.g. printers.

Tissues and bins should also be provided in appropriate locations to encourage good respiratory hygiene and immediate disposal of tissues.

Employee groups must continue to apply social distancing within their group and not gather with other groups.

All employees must be aware and respectful of the space that they are giving others in corridors, doorways, toilets and communal spaces. Consideration must be given to this employee group in the overall setting assessment including: cleaning and disinfection, arrival and leaving, circulation spaces, use of shared facilities and hand hygiene.

### **4.8 Planning for Emergencies**

#### **First aid**

Where staff hold a first aid certificate (general or emergency first aid) that expired after 16 March 2020, validity was extended to 31 October 2020 or 6 months from the date of expiry, whichever is later. All requalification training for these certificates should be completed by 31 March 2021

Where you cannot access requalification training because of coronavirus, you will qualify for an extension in instances where you can:

- Explain why you haven't been able to requalify
- Demonstrate what steps you have taken to access the training, if asked to do so
- Demonstrate you have reviewed your first aid risk assessment, have reduced the risk where possible and have alternative arrangements in place to provide appropriate first aid as needed

The requirement for all newly qualified entrants to the early years workforce who have completed a level 2 or level 3 qualification to also have either a full paediatric first aid or an emergency paediatric first aid certificate within 3 months of starting work in order to be included in the required staff: child ratios has been disapplied.

There remains a requirement for at least one person who has a current PFA certificate to be on the premises and available at all times when children aged below 24 months are present.

Where a provider has only children aged 2 to 5 in their care they must use 'best endeavours' to have one person with PFA on site.



## **COVID-19 Compliance code for all educational settings**

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All PFA certificates that expired on or after 1 October 2020 will remain valid until 31 March 2021

This should enable you to ensure that retraining can occur in a prioritised way.

First aiders should continue to refresh their knowledge through using on-line refresher training.

Please refer to the COVID-19 *First Aid Guidance* document for information about first aid delivery and COVID-19.

### **Fire**

Fire drills should be resumed as normal. The school should encourage social distancing as part of the fire drill. It is important to still ensure that pupils understand that they must leave without delay in an emergency.

Fire assembly points should be reviewed to ensure that pupils can assemble in their group and group mixing is avoided, separate assembly points may help in some instances to prevent gathering together.

### **4.9 Hiring School Premises (and providing premises for club use)**

Where school premises are hired out or used by clubs, the school must ensure that they complete the Premises Use Risk Assessment Form, considering:

- Additional cleaning and disinfection after use, consideration should be given to routes and rooms used at the premises, including toilet facilities and associated school equipment. This may also include external areas of the site. Please note: the school may also need to arrange for additional cleaning and disinfection prior to use if scheduled cleaning and disinfection does not take place before use.
- Limiting access to only those parts of the site necessary (where possible and considering fire evacuation requirements), in order to reduce contamination risks and areas that need to be cleaned afterwards
- That the user confirms they are following COVID-19 secure arrangements for their activities (using the premises hire declaration checklist)
- Avoiding premises hire during school operating hours where possible, with the exception of use of school facilities for educational purposes such swimming pool hire.
- How infection risks can be reduced e.g. where physical activity is taking place not permitting the use of changing rooms except where necessary e.g. for swimming
- Where more than one hire takes place at the same time how groups will be separated, including during entrance and exit.
- The school and hirer should agree and confirm their responsibilities prior to use of the premises.



## **COVID-19 Compliance code for all educational settings**

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In addition, any activity or provision where members of the public take part or make use of the setting must have a QR code available for checking in purposes. This includes where the premises or parts thereof are let out to external providers.

### **5. Review**

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School employers should have active arrangements in place to monitor that the controls are:

- effective
- working as planned
- updated appropriately (reflecting updates to this compliance code)