

Background to this 'Covid 19 Risk Assessment' for Kendal College

The World Health Organisation (WHO) describes SARS Cov 19 / Coronavirus disease (COVID-19) as an infectious disease caused by a newly discovered coronavirus:

“Most people infected with the COVID-19 virus will experience mild to moderate respiratory illness and recover without requiring special treatment. Older people, and those with underlying medical problems like cardiovascular disease, diabetes, chronic respiratory disease, and cancer are more likely to develop serious illness. The best way to prevent and slow down transmission is to be well informed about the COVID-19 virus, the disease it causes and how it spreads. The COVID-19 virus spreads primarily through droplets of saliva or discharge from the nose when an infected person coughs or sneezes, so it’s important that you also practice respiratory etiquette (for example, by coughing into a flexed elbow).”

This is a **Generic College Wide Risk Assessment** for managing with the risk of transmission of Covid-19 in the workplace. It is not likely to cover all scenarios and each employee, student, and visitor should consider their own unique circumstances in interpreting the control measures identified. The control measures and actions listed are based on the guidance from the UK Government and the Department for Education, Public Health England, NHS, SAGE, WHO, and specialist organisations working with vulnerable individuals and groups.

Department for Education (DfE) - Further education coronavirus (COVID19) operational guidance February 2021:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964722/Further_education_coronavirus_COVID-19_operational_guidance.pdf

Safe working in education, childcare and children’s social care settings, including the use of personal protective equipment (PPE) Updated 2 March 2021:

<https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care/safe-working-in-education-childcare-and-childrens-social-care-settings-including-the-use-of-personal-protective-equipment-ppe>

Risk Management Framework (Actions taken from March 2020 until January 2021):

Kendal College chose to cease 'normal activity' on the 17th March due to growing public concern about the health risks presented by the spread of a novel coronavirus. National school closure was announced by the Government from 23rd March.

In making the decision to cease normal opening, the College Principal consulted with SLT and Governors, as well as the Educational and Skills Funding Agency (ESFA).

In order to establish the nature of the risks posed (both in terms of Health and Safety and business continuity), and to involve other stake holders in the decision-making process, meetings were held regularly from March '20 until July '20, in a rapidly evolving context. The following arrangements were put in place to consider the Covid 19 risks:

- Weekly Senior Leadership Team (SLT) and Head of Department (HoD) meetings
- Governance and Corporation meetings
- The Principal and the other Cumbrian College Principals via the FE4 network
- College wide staff communications
- Staff working groups, advising on specific aspects of risk management
- Communications with Unison and UCU staff unions
- The Principal is a member of the AoC working group on college reopening
- Fortnightly meetings with the ESFA regional contact until the summer break
- SLT are working with the Local Authority on Cumbria wide actions
- Reporting to Cumbria County Council on Positive cases and actions taken
- Reporting to DfE/NHS on positive cases and actions taken
- A fortnightly SLT/Governor task and finish group set up to monitor Covid-19 actions until the summer break

Following closure, a fortnightly SLT/governor task and finish group was established to look at the impact of Covid-19 on the college in relation to finances, staffing, and reopening chaired by a College governor, and to agree how the College should respond. Furthermore as Government guidance became clearer, three internal Working Groups were established from staff volunteers, with some selection of colleagues with specific experience and expertise (e.g. Nursing, and HR backgrounds). Each group explored a specific theme, which included 'Estates', 'Staff and Student Safety', and 'Curriculum'. Each Group was facilitated by an SLT Member (Louise Shrapnel, Matt Burke, and Richard Evans respectively) with specific expertise to each group's area of discussion.

The outcomes of the above employee consultations were used to inform the risk assessment and action plans, which were then refined by SLT, and with the two named Health and Safety Competent Persons, Phil Dudley (H&S Manager) and Matt Burke (SLT Member with responsibility for H&S) , and which the College has now applied.

The final risk assessment was shared with all employees, and also presented in a range of forms, including a 'Staff Booklet', 'Student Induction Supplement', 'Health and Safety Instructions for Visitors', 'Subcontractor Code of Conduct', 'Student Video', 'Student FAQs' and signage referencing specific control measures placed in planned locations around the College Estate.

The Senior Leadership Team then reviewed this Risk Assessment in response to:

- Feedback from governors, employees, students, and other persons
- New Government / DfE guidance, and advice from SAGE
- Public Health England and National Health Service guidance
- Education and Skills Funding Agency consultation
- Cumbria County Council consultation
- Any other sources deemed to be relevant to the College's context

In order to capture additional feedback from all persons as the control measures were implemented, a number of channels including email, and telephone contacts were created to enable individuals to raise concerns, share observations, and ask questions. This service has been maintained by College Managers, and issues raised are shared with SLT on a weekly basis.

In addition, the Health and Safety Manager and the Duty Manager (with support from SLT) receive and manage any immediate concerns raised related to the health and safety.

Contact information for both of these arrangements was made available through College Website, and through all staff emails.

Throughout the formation of this Risk Assessment, the impact of the application of control measures / arrangements have been considered in relation to vulnerable groups and individuals (including learners with an EHCP, Care Leavers, and 'Children Looked After'), those with 'protected characteristics' (as defined by the Equality Act), Young People (as defined by Reg. 19 MHSWR 1999), and Expectant Mothers (as defined by Reg. 16 MHSWR 1999)

February 2021 Update:

The Government's plan was for all pupils (and students) in all year groups, to return to school on various dates during January 2021.

As a result of rising Coronavirus (Covid-19) cases and mounting pressure on the NHS, the Government placed England into National Lockdown from 06/01/21 (with devolved Governments following suit).

Colleges, primary (reception onwards) and secondary schools remained open for face to face provision to [vulnerable children and young people and the children of critical workers only](#). All other pupils (and students) were asked to learn remotely until at least February half term.

During this same period, all education providers were asked to introduce Lateral Flow Device (LFD) testing for asymptomatic staff and students, which the College began on 8th January by converting the Milnthorpe Road Campus Café into a Testing Centre, and using predominantly existing employees to operate the testing regime. All staff participating were trained using an online NHS/DfE training programme, and testing was undertaken for self selecting students attending exams, and staff who were required to work on site. 305 LFD tests have been carried out to date (26th February 2021), with no positive test results being found.

Participation in the LFD Testing process is voluntary; a point which has been reinforced by both Government through the media, and also in all contact the College has had with the NHS and DfE. Test 'subjects' are informed of this as they register to be tested using the Government's online system before proceeding to be tested, as well as through the College's own consent form which is a mandatory part of the process.

The LFD programme has been the subject of much public and scientific debate, with concerns raised about its accuracy and the potential 'green lighting' behaviour of those who receive a confirmatory negative test, which it is believed may encourage a reduction in adherence to the key Covid Control Measures (described in this Risk Assessment). The College sees communication with students around their personal behaviours following testing, and potential relaxation of rules (relating to social distancing and the wearing of face coverings) as a very important additional control measure as we proceed into students beginning to attend College following the current lockdown.

March 2021 Update:

Following the announcement that schools and colleges will return from the 8th March 2021, the Government have reviewed the health and safety guidance, most recently on the 2nd March, in relation to the safe use and disposal of PPE. This Risk Assessment has been reviewed to support these changes.

Health & Safety Management Elements prescribed by the Government:

Colleges must comply with health and safety law, which requires them to assess risks and put in place proportionate control measures. Colleges should thoroughly review their health and safety risk assessments and plans that address the risks identified using the system of controls, with which colleges will now be familiar. Fundamentally, the control measures that colleges/settings already have in place to reduce risks will, on the whole, remain in place. Essential measures include:

- *a requirement that people stay at home if they: are ill with virus symptoms, have tested positive even if asymptomatic, have been advised by NHS Test & Trace to do so, are household members of a positive case, even if that case is asymptomatic or are required to self-isolate for travel-related reasons;*
- *robust hand and respiratory hygiene;*
- *enhanced cleaning and ventilation arrangements;*
- *active engagement with NHS Test and Trace;*
- *formal consideration of how to reduce contacts and maximise distancing between those in school wherever possible and minimise potential for contamination so far as is reasonably practicable;*
- *minimise the potential for contamination so far as is reasonably practicable.*

How contacts are reduced will depend on the colleges circumstances and will (as much as possible) include:

- *keeping students in consistent groups;*
- *avoiding contact between groups;*
- *arranging classrooms with forward facing desks;*
- *staff maintaining distance from pupils and other staff as much as possible.*

Having assessed the risks, the College has instigated the following system of controls, adopting each to the fullest extent possible, in a way that addresses the risks identified in the assessment and allows the College to deliver a broad and balanced curriculum for students, including full educational and care support for those pupils who have SEND and other vulnerabilities.

Prevention:

- 1) minimise contact with individuals who are unwell by ensuring that those who are required to stay at home do not attend College;
- 2) where recommended, use of face coverings in College;
- 3) clean hands thoroughly more often than usual;
- 4) ensure good respiratory hygiene by promoting the 'catch it, bin it, kill it' approach;
- 5) introduce enhanced cleaning, including cleaning frequently touched surfaces often, using standard products such as detergents;
- 6) minimise contact between individuals and maintain social distancing wherever possible;
- 7) where necessary, wear appropriate personal protective equipment (PPE);
- 8) always keeping occupied spaces well ventilated.

Numbers 1 to 5 and number 8 must be in place at all the time.

Number 6 must be properly considered and must put in place measures that the particular circumstances.

Number 7 applies in specific circumstances.

Response to any infection:

- 9) engage with the NHS Test and Trace process;
- 10) manage confirmed cases of coronavirus (Covid-19) amongst the College community;
- 11) contain any outbreak by following local health protection team advice;
- 12) the college **must** notify the DfE through the usual notification channels (via email) of any confirmed cases of coronavirus (Covid-19) in the setting (either students or staff member), and if the setting is advised to close as a result.

Numbers 9 to 12 must be followed in every case where they are relevant.

Risk Reduction approach advised by the Government:

Risk reduction measures should (as with all other risk assessments) be assessed in order of priority as set out below; colleges should not simply adopt the easiest control measure to implement. Controls should be practical to be implemented and, ideally, should be able to be maintained easily over time. It is critical to remember that it will only rarely be feasible to eliminate individual risks completely.

- 1) **Elimination:** stop an activity that is not considered essential if there are risks attached.
- 2) **Substitution:** replace the activity with another that reduces the risk. Care is required to avoid introducing new hazards due to the substitution.
- 3) **Engineering controls:** design measures that help control or mitigate risk.
- 4) **Administrative controls:** identify and implement the procedures to improve safety (for example, markings on the floor, signage).
- 5) Having gone through this process, **PPE** should be used in circumstances where the guidance says it is required.

Mass Lateral Flow Device Testing

The context for onsite testing:-

Following the identification of a new strain of coronavirus and a rapid increase in infections in England during December 2020, the Government requested that all schools/colleges engage with onsite mass lateral flow testing to support the tracing and control of COVID-19 from January 2021.

Public Health Aims:-

Active Case Finding

Identify positive cases of COVID-19 and ensure they self-isolate to reduce transmission to other people.

Surveillance

Provide further information on asymptomatic transmission in addition to the ongoing COVID19 surveillance in the college population and targeted local public health response to prevent spread to the wider community.

Public Health England and the Health and Safety Executive require this information to ensure 'end to end' health, safety and infection control risks for mass lateral flow device testing are identified, pre-assessed, managed and monitored regularly by the site owners and testing operators.

Kendal College has built this Risk Assessment to ensure compliance with what is recommended by Public Health England and the Health and Safety Executive. The College has also utilised the DfE's 'document sharing platform' which includes resources to support the roll out of mass testing.

This includes: the workforce planning tool – to calculate how many staff are needed to set up the test site, a 'How to Guide' for Rapid Testing (operational guidance), Training Guide for Rapid Testing, NHS Test and Trace Digital Handbook, Competency checklist for key roles, video to support setting up a testing site, sample Quality Checklist, consent form, Risk Assessment Template, model privacy notices and data protection FAQs for parents and students.

This is supported by a specific COVID-19 College Onsite Mass Lateral Flow Testing Risk Assessment, which is located on a notice board in the testing centre, and on The Hub (electronically).

Students:-

From the 8th March 2021 participating students are required / strongly encouraged to take 3 LFD tests in College, with a 3-5 day interval between each, and will then move to 'home testing' twice a week, which may also include an opportunity for testing of their family/support bubble. We expect all of the first 3 tests undertaken by full time students to be completed by Friday 19th March.

Staff:-

From the 8th March 2021 staff will begin conducting Covid 19 Lateral Flow Device testing from home using specific test kits supplied by NHS test and trace.

Risk Assessment

This risk assessment has been presented in a format designed to be easy to follow, and to identify the actions that must be undertaken by individuals and the organisation in order to control the risks presented by the identified Covid 19 hazard. Significant changes have been **highlighted in red**.

The activity undertaken by those associated with the College can be divided under the following headings according to where they will be physically located and type of activity:

- 1. Public Areas**
- 2. Communal Areas**
- 3. Transport to and from College**
- 4. Working from home**
- 5. Working at another location (away from the College)**
- 6. Emergency Evacuation and Dynamic Lockdown**
- 7. Provision of First Aid**
- 8. Learning Support**

This potential risk of exposure to the identified hazard (Covid19) has been applied to each of these contexts, in relation to the transmission of the virus through both the 'directly' and 'indirectly'; defined as follows:

‘Direct Transmission’ of the Virus:

The most effective method for controlling the transmission of the Covid 19 virus involves avoiding **direct transmission** caused by close contact between individuals, and airborne proliferation through sneezing and coughing. This is best achieved by maintaining separation between individuals (‘social distancing’), and as such individuals in the following groups should not attend College Sites, in order to eliminate the risk of infection spreading, and should follow NHS/PHE advice on ‘self-isolation’ and ‘Shielding’:

Infected individuals

Those who have come into contact with infected individuals either at the College, or externally, in line with current Government guidance, using the **‘Standard Contact Definition’**:

a person who has had face-to-face contact (within one metre), with someone who has tested positive for COVID-19, including:

- being coughed on
- having a face-to-face conversation within one metre
- having skin-to-skin physical contact, or
- contact within one metre for one minute or longer without face-to-face contact

a person who has been within 2 metres of someone who has tested positive for COVID-19 for more than 15 minutes

Students should notify the College of a positive test, symptoms, or contact with a positive case as soon as possible by emailing: studentcovid@kendal.ac.uk and informing their tutor.

College employees should notify the College of a positive test, symptoms, or contact with a positive case as soon as possible by emailing: coronavirus@kendal.ac.uk and informing their line manager.

The College will report all positive cases it is notified about to Cumbria County Council’s Test and Trace Team, and if required at the time the DfE (at the time of production of this revised risk assessment this requirement is inactive). Cases will be reported on the same day if notified before 4pm.

Groups who should not attend College in person:

Vulnerable individuals, advised to ‘shield’, or to exercise caution, by NHS/GP; which may include those identifying as BAME, and the elderly

Those defined as ‘Clinically Extremely Vulnerable’ by the NHS/GP, **and including Pregnant staff or students**

(Applying to: Staff, Students, Governors, all Visitors, and Subcontractors)

Cont.

In addition to 'social distancing', Personal Protective Equipment (PPE), in the form of 'face masks' and other 'face coverings', will contain airborne proliferation of the virus to some extent, although the fitting of the covering/mask and the personal habits formed around its use, are likely to affect how effective this control measure can be. The College will follow Government guidance on the mandatory use of face coverings throughout the lifespan of this risk assessment.

'Indirect Transmission' of the Virus:

For persons attending College sites, or travelling to and from College sites using public transport; there is the additional risk of contact with the virus through 'indirect transmission'.

This means that a person carrying the virus at an infectious stage can potentially spread the virus through direct contact with objects, for example by sneezing or coughing onto a hand which is then placed on a surface or object that others will come into contact with (e.g. door handles, or shared piece of equipment). Controlling this potential method of transmission is best achieved through personal hygiene (e.g. regular hand washing; the use of hand sanitisers; frequent, robust and targeted cleaning operations; and importantly personal behaviours related to containing sneezing and coughing).

The Covid 19 virus also becomes infectious when a person breathes in numerous live virus cells suspended in the air.

Recycling ventilation can spread live virus cell to neighbouring rooms. Poor air flow in enclosed spaces can contribute to a build-up of live virus cells in the air.

It is possible for paper surfaces to hold live virus cell for up to 24 Hrs and plastic surfaces for up to 48 hrs.

<https://www.england.nhs.uk/coronavirus/primary-care/about-covid-19/virus-transmission/>

<https://www.gov.uk/government/publications/wuhan-novel-coronavirus-infection-prevention-and-control/reducing-the-risk-of-transmission-of-covid-19-in-the-hospital-setting>

1. Public Areas

IDENTIFIED HAZARD 1a: Spread of CV19 in 'Public Areas', through 'direct transmission'.

'Public Areas', defined as places where any person on the College Sites could access:

Reception Areas, public meeting/interview rooms, corridors, toilets, cafés, restaurant, venues, carparks, lawns/woods, and the Museum

Specific risk factors:

Individuals come into close contact with each other due to high density occupation of spaces

Individuals come into contact with others for prolonged periods indoors

Individuals are not aware of control measures in place and breach them

Individuals choose to ignore control measures / expectations

Individuals come into contact with a large number of other persons

Control Measures (Following the 'Hierarchy of Control'):

The key control measure for this Hazard is Social Distancing, i.e. managing the number of persons in any area to enable social distancing of 2 metres as recommended by PHE, and allowing fulltime to students to operate in 'bubbles', with separation between these groups.

- Maintain Social Distancing of 2m at all times when possible, and 1m with additional risk mitigation (e.g. additional PPE and cleaning)
- A face covering should be worn at all times whilst indoors, and whilst outdoors if social distancing cannot be maintained
- **All students must wear a face covering in public areas and maintain social distancing at all times (unless medically exempt), including those attending exams and ECHP students.**
- **Students should be issued with a face mask if they do not have one, and encouraged to use fresh masks provided by the College as necessary.**
- **Face Masks should be freely available to employees who choose to use one in preference for their own face covering**
- Ventilation should be maximised in all indoor spaces
- Avoid face to face contact with all persons
- **Live audiences for events should be discouraged wherever possible, until national control measures begin to relax.**
- Clear communication with all persons should be proactively undertaken to share H&S instructions/expectations, in a range of forms
- A 'familiarisation' meeting should be held with each employee upon return to work to share concerns, and discuss Risk Assessment arrangements
- Visits to College sites by persons other than employees, students, and governors should not be permitted where an alternative for remote contact exists
- All contractors / subcontractors should provide the college with updated Risk Assessments and Method Statements prior to work commencing, these will be reviewed by the Health and Safety Manager to ensure that they are suitable and sufficient
- Wherever possible, contractors / subcontractors will schedule maintenance and project works outside of curriculum delivery times.
- Students not attending scheduled sessions should not attend College
- Essential visitors and subcontractors should attend sites by appointment only (signage required at all entrances)
- All visitors and subcontractors should be asked to read H&S CV19 Instructions upon arrival (available in range of forms)
- Open Days and Student Guidance for applicants should be conducted online whenever possible
- College cars should be cleaned between users
- Unnecessary travel around the College Sites should be minimised
- Support Function Offices should not be visited by staff or students unless essential
- Arrangements made for the exchange of paper-based administration which eliminate contact between individuals, including move to paperless
- Fulltime students will operate in 'bubbles', based around Departmental and Programme structures.
- Students in 'bubbles' will maintain social distancing from all College employees, and students in other 'bubbles' whilst on College sites
- Adult, apprentices, and part time students will be designated into 'rainbow' groups who will maintain social distancing from all other persons.

- Student groups (bubbles and rainbows) will be given different coloured lanyards to enable all persons to distinguish whether 2m social distancing is required.
- Groups of Students (or others) should be managed/lead to prevent overcrowding of public areas, for example at break and lunchtimes
- Cafes will operate a schedule with designated times for each bubble, and rainbow groups
- Teachers should break from timetabled sessions in order to enable the Café schedules
- All public spaces where people may be required to queue to have 2m markers and signage (Receptions, Cafés, Toilets, Learning Centre, enrolment
- Corridors and Stairways should observe a 'keep to the left and single file' rule, enabling easier maintenance of distancing
- Capacity of Small Public Spaces (including Toilets, and the Lift) should be limited
- Perspex screens should be provided for employees at desks in public areas (Receptions, Learning Centre, Museum etc.), or where seated in close proximity.
- First Aiders are by necessity required to act; they should utilise appropriate PPE under the terms set out in Section 7

Residual Risk / Further Action Required After Control Measures Applied.

Cafe access requires close monitoring to ensure that social distancing is maintained between all groups (bubbles and rainbows)

Student compliance with the wearing of lanyards is essential, and should be underpinned by consistent and rigorous behaviour management.

First Aiders should debrief incidents to share concerns and best practice emerging.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Those self-identifying as being exempt from wearing a 'face covering' may feel discrimination/judgement from others; a clear system is in place whereby those exempt from wearing a face covering have a symbol printed on their identity badge, in order to legitimise this practice for this set of individuals.

IDENTIFIED HAZARD 1b: Spread of CV19 in 'Public Areas', through 'indirect transmission'.

'Public Areas', defined as places where any person on the College Sites could access:

Reception Areas, public meeting/interview rooms, corridors, toilets, cafés, restaurant, venues, carpark, lawns/woods, and the Museum

Specific risk factors:

Individuals transmit the virus through contact with surfaces / objects that are then touched by others

Contact with deliveries and packages

Cash Handling

Poor air recycling and ventilation

Food and drink preparation and sales

Inappropriate disposal of food and drink waste, and other personal litter

Inappropriate disposal of sanitary products

Inappropriate disposal of PPE first aid waste

Use of shared toilets

Use of shared kitchens

Poor Hygiene

Individuals are not aware of control measures in place and breach them

Individuals choose to ignore control measures / expectations

Control Measures (Following the 'Hierarchy of Control'):

- Internal doors should be wedged in an open position wherever practicable, but closed in the event of an emergency evacuation or building unoccupied.
- Seating should be removed from reception areas, and seating 'thinned out' in other public areas to maintain distancing.
- Electronic financial transactions should be encouraged in preference to cash handling
- Paperless systems should be used for administration wherever practicable, in preference to handling documents
- Drinking water outlets should be wiped between uses
- **Maximise ventilation by opening windows, and running air handling units/air conditioning where used air is not recirculated by the system**
- **Switch Air Handling units to 100% fresh air intake**
- Individuals should be encouraged to bring their own food and drinks (hot and cold), and to take away their litter /waste home.
- All persons should be advised not to share food and not handle other people's cutlery & cups
- The food and drink offer should be restricted to a take away service, in order to reduce the use of shared furniture, crockery, cutlery etc.
- Visitor lanyards should not be used; disposable stickers should be issued instead
- Packages received at reception and Facilities offices should only be handled with gloved hands, labelled with delivery time and date & placed in quarantine for 48 hrs. After 48 hours the packages should be collected from the Mail Room (or corridor).
- A process is required for accepting deliveries of any consumables that may be temperature sensitive or deteriorate quickly if not protected.
- On arrival at college – All persons should wash their hands or sanitise as soon as possible (posters, signs, and direct intervention will communicate this)
- Hand washing or sanitising facilities should be available at all times, with paper towels for hand drying
- Gel Hand Sanitiser stations should be located in public areas or where washing facilities are not readily available.
- Appropriate signage within all public areas alerting all persons to the need for high standards of hygiene, and advising on hand washing
- Employees and Students should be reminded on a regular basis to clean their hands, where possible with soap and water, and the importance of proper drying.
- Plan to ensure that the minimum number of Facilities/Cleaning staff are on site to operate safely and effectively.
- Increased cleaning of toilets and hand washing areas, with signed schedules in place.
- Cleaners should regularly clean all frequently used touch points (door handles, door push bars, handrails, lift buttons, and counter tops throughout the day with bleach based cleaner/disinfectant.
- In the event that an individual is suspected to have become infected, the facilities accessed should be deep cleaned.
- Hand sanitiser and disinfectant wipes to be available at each toilet to enable 'clean handling' of door handles

- Food and drink preparation should be undertaken in line with specific Covid 19 advice issued by the Food Standards Agency.
- Additional bins should be provided in public areas, which are emptied safely.
- PPE should be provided to the Cleaning and Estates Teams (for personal use, and in sufficient quantities to prevent 'extended use')
- **Face masks / coverings and other PPE should be removed and disposed of in double black plastic bin liners and place in the regular waste, unless from a person with Covid Symptoms when it should be disposed of as clinical waste (see LFD and First Aid Risk Assessments).**
- Disposable gloves to be provided for staff handling money, parcels, documents etc. from visitors.
- Supplies of soap, hand sanitiser, paper towels, and PPE should be maintained

Residual Risk / Further Action Required After Control Measures Applied.

- All persons should be reminded to catch coughs and sneezes in tissues – Follow *Catch it, Bin it, Kill it* and to avoid touching face, eyes, nose or mouth with unclean hands. (Remember people may suffer from hay fever or other allergies / health issues that cause coughing or sneezing)
- Report concerns as required through channels described

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Personal hygiene routines should be intensified/modified for students who require personal care

Specific guidance exists on the procedures required for administering personal care: <https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care/safe-working-in-education-childcare-and-childrens-social-care-settings-including-the-use-of-personal-protective-equipment-ppe#cleaning-update>

COMMUNAL AREAS

IDENTIFIED HAZARD 2a: Spread of CV19 in 'Communal Areas' through 'direct transmission'

'Communal Areas' defined as places where Staff, Students, Governors, Visitors, and Subcontractors undertake 'activity':

Classrooms, Specialist Workshops/Facilities, Staff Rooms / Offices, Staff Kitchens, Changing Rooms, Back of Reception, and College Vehicles

Specific risk factors:

Individuals come into close contact with each other due to high density occupation of spaces

Individuals come into contact with others for prolonged periods indoors

Individuals are not aware of control measures in place and breach them

Individuals choose to ignore control measures / expectations

Individuals come into contact with a large number of other persons

Control Measures in addition to those covered in Section 1a (Following the 'Hierarchy of Control'):

- Social distancing should be maintained whenever possible
- Face to face contact should be avoided. In Performing Arts this should be conducted in line with DfE and DCMS guidance.
- **All students should be asked to wear a face covering in communal areas and to maintain social distancing at all times, including those attending exams and students with ECHPs.**
- **Ventilation should be maximised in all indoor spaces, with allowance made for the requirement to wear additional clothing**

- Singing and shouting within Music and Performing Arts, and Sports, should be in line with the specific DfE and DCMS guidance issued
- Physical activity (Sports and Outdoor Adventure Programmes) should be undertaken in large well ventilated spaces if an outdoor option is not available, and in line with specific DfE and Sport England Guidance
- Students that do not have scheduled sessions should not attend College
- Timetables should be ready to be adapted to online learning in the event that a further full lockdown occurs, or a group (bubble or rainbow), or a teacher is required to isolate
- Email, telephone, and online staff meetings should be encouraged in preference to face to face meetings where practicable
- Employees should be encouraged to undertake administrative work at home where practicable; with a Departmental on-site presence rota'd
- Teachers will conduct a mandatory health and safety briefing to students, and communicate requires regularly throughout induction
- Students will confirm that they have read (or been supported to access) the Covid Student Handbook through Promonitor / Smart Assessor
- Those working with learners with Special Educational Needs including limited communication skills and understanding of social boundaries, should create a 'method statement' with support from SENCOs and the H&S Manager to create arrangements to promote social distancing appropriately
- Personal Risk Assessments for employees and students with underlying health issues (which do not indicate 'shielding') should be reviewed with reference to the Covid 19 hazard
- The number of student 'bubbles' that each individual teacher and learning support assistant is exposed to should be minimised whilst also considering the demands of the curriculum and teacher specialisms
- A max occupancy rate should be determined for all seated classrooms, through HoD and H&S Manager
- A max occupancy rate should be determined for all workshops and specialist facilities based on different activity types, through HoD and H&S Manager
- A max occupancy rate should be determined for the Learning Centres, and any spaces converted into large teaching spaces (e.g. cafés)
- Changing rooms should be used by a single bubble, and be cleaned regularly
- Spaces within the College should be assigned for teachers, from which to deliver online learning
- Government industry specific guidance will be implemented where College activity replicates the external environment, e.g. Hair and Beauty
- Training should be provided to teachers to enable confident use of online teaching to support the reduction of student numbers on site.
- Reconfigured large spaces (e.g. café, Upper Museum Gallery etc.) should be utilised to achieve social distancing during activity with large groups
- Seating areas should be reconfigured / removed so that only enough seats are provided to allow maximum occupancy of the space.
- Staff Rooms and offices should be rota'd to enable distancing when combined with working from home patterns.
- Adjacent desks, and desks which face each other should not be used.
- Teachers will be responsible for ensuring that students comply with Social Distancing rules
- PPE (e.g. safety glasses) will be assigned to individual students, and labelled with their name, they will keep all items and bring to college as required.
- Personal possessions and clothing belonging to students should be kept with the individual, and not collected together.
- Learning Support Assistants will adhere to the specific guidance outlined in Section

Residual Risk / Further Action Require After Control Measures Applied.

Whilst 2m social distancing is not required for students operating in bubbles, they should wherever possible still maintain some measure of social distancing as is practicable in line with the activity being undertaken. In areas such as Performing Arts and Sports this will require forward planning and thought about alternative approaches to teaching and learning.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Consideration should be given to individuals stating that they have mask exemption due to medical reasons within the context of all learners being requested to wear face coverings/masks in classrooms and workshops. Teachers and Learning Support Assistants may need to sensitively communicate this apparent inequity to other students.

IDENTIFIED HAZARD 2b: Spread of CV19 in 'Communal Areas' through 'indirect transmission'

'Communal Areas' defined as places where Staff, Students, Governors, Visitors, and Subcontractors undertake 'activity':

Classrooms, Specialist Workshops/Facilities, Staff Rooms / Offices, Staff Kitchens, Changing Rooms, Back of Reception, and College Vehicles

Specific factors:

Individuals transmit the virus through contact with surfaces / objects then touched by others

Shared use of desks and tables in communal areas

Shared use of resources (curriculum and support)

Sharing of PPE

Inappropriate disposal of used PPE

Inappropriate disposal of food and drink waste

Control Measures (Following the 'Hierarchy of Control') in addition to controls in section 1b:

- Shared tools, equipment, and IT to be avoided in favour of personally assigned equipment, but where this is not possible equipment should be cleaned after each use.

- 'Hot desking' should not be used, with desks assigned to individuals who would also be responsible for cleaning their own keyboard, mouse etc.
- Paperless systems should be used wherever practicable, in preference to handling documents
- Worktops, desks and tables should be wiped down in classrooms, workshops and offices before use
- Open windows and doors to facilitate frequent and rapid air exchange and cross flow ventilation.
- Employees should clean their own workstation before and after use, using disinfectant wipes, or spray and clothes provided
- Food and drink should be consumed either in designated staff rooms/offices, or classrooms to avoid distributing food around buildings
- Cleaning wipes and hand sanitiser should be made readily available in all communal areas

Residual Risk / Further Action Require After Control Measures Applied.

Student's use of classrooms (and some workshops) for eating, contradicts previous College rules, and as such will need significant reinforcement and monitoring

Where students do not have access to a suitable space (because all facilities are unsuitable workshops), then a designated space should be identified.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Staff and students with disabilities should be offered a risk assessment, with the potential to identify alternative arrangements for working and lunch breaks

IDENTIFIED HAZARD 3: Spread of CV19 whilst travelling to and from College sites.

Specific factors:

Shared car use

Overcrowded public transport

Lack of public transport

Student shared public transport with no social distancing

Control Measures (Following the 'Hierarchy of Control'):

- Lift sharing should be discouraged
- College cars should be assigned to sole users where possible
- Student timetables should consider the availability of public transport, and the safety implications of late travel for vulnerable students
- The transport needs of students with physical disabilities, usually dependent on taxis should be considered
- Travel between College Campuses should be limited to essential travel only
- Students should be strongly encouraged to maintain bubbles whilst on public transport wherever possible
- Use of Kendal College only buses
- Students should be told to follow government guidance on the wearing of face coverings whilst using public transport
- Students should be discouraged from sharing personal transport with persons from outside of their bubble, and to use PPE in this context.
- **Whilst walking to and from College students should be asked to limit group sizes to two persons inline with the national lockdown expectations; i.e. 'bubbles' do not exist outside of the College settings.**

Residual Risk / Further Action Require After Control Measures Applied.

Vulnerable students, including those travelling long distances require frequent monitoring both in relation to the availability of appropriate transport, but also in relation to risks to retention as a result of becoming demotivated.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics: (as above)

IDENTIFIED HAZARD 4: Working from Home

Specific factors:

Employees are unable to fulfil duties assigned safely at home

Employees have caring responsibilities (as parents for example) where child care provision remains unavailable

Employee wellbeing (including mental health) may suffer as a result of social isolation and associated factors

Workstations may not be suitable and lead to for example Repetitive Strain Injury

Computer Displays and lighting conditions may be unsuitable

Seating may be unsuitable, in relation to posture, and adjustability

Control Measures (Following the 'Hierarchy of Control'):

- All employees should be offered the opportunity to speak to the H&S manager about adaptations that could be made to work stations, seating etc.
- Employees should be consulted about flexible modes of working by their line manager
- Managers should encourage flexible working arrangements to support employees with caring responsibilities or underlying health concerns
- Wellbeing support should be offered in a range of forms, both formal and informal
- Groups of employees should be encouraged to make social as well as professional contact with colleagues
- Wellbeing materials should be made available on the College Hub for employees

Residual Risk / Further Action Require After Control Measures Applied.

During the initial stages of the Covid 19 crisis, the HSE have drawn a distinction between temporary Home Working and Permanent Home Working. As we move into the Return to Work phase, employees who continue to work from home may require a DSE assessment.

<https://www.hse.gov.uk/toolbox/workers/home.htm>

The Health and Safety Manager upon a request from a member of home working staff will supply a DSE Assessment form for them to complete and return.

The college will provide additional resources for Home Workers, as necessary.

The Health and Safety Manager will monitor all assessments & pass on requests for the provision of resources to Assistant Principal Corporate Resources.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Individual employees with existing medical conditions may need to additional support to ensure that their home working environment is suitable, and to work from home if shielding.

IDENTIFIED HAZARD 5: Working at another location (away from the College), including Student Work Placement, and Educational Visits

Specific factors:

Businesses / organisations do not uphold sufficient H&S culture to provide reassurance that College employees and/or students will be kept safe on their premises

Control Measures (Following the 'Hierarchy of Control'):

- Businesses / organisations will be expected to provide a risk assessment including Covid 19 measures
- Businesses / organisations will be expected to demonstrate who they have planned for adaptations to their Covid 19 risk assessment in relation to Reg 19 MHSWR, relating to 'young persons'
- College employees should uphold the same control measures applied to public spaces within this risk assessment whilst on the premises of another employer/business
- Educational visits on foot to local outdoor venues (e.g. Kendal Castle, or a Park) should continue. Students should carry an explanation of the 'DfE rules' related to bubbles to share with the public should they be challenged
- Educational visits to indoor venues should be discouraged, outdoor activity should continue provided that transport arrangements do not compromise the key control measures

Residual Risk / Further Action Require After Control Measures Applied.

Non-compliance of businesses/organisations with their own Risk Assessments, possibly as time passes. Checks may need to be made using a risk based approach

Students should be briefed to check understanding of the differences between H&S arrangements within the College setting, and with an employer

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Vulnerable students, possibly with SEN or mobility issues may be declined work placement opportunities by a business / organisation with the view that the risk assessment is too complex; this should be challenged by the College in line with the Equality Act.

IDENTIFIED HAZARD 6: Emergency Evacuation and Dynamic Lockdown

Specific factors:

Failure to communicate revised arrangements could lead to ineffective evacuation or lockdown

Emergency evacuation becomes ineffective and/or presents additional hazards due to adherence to Covid 19 Control Measures

Maintaining social distancing by working in rooms alone may lead to failure to clear buildings

Personal Emergency Evacuation Plans for vulnerable persons, and those with mobility issues, may be incompatible with Covid 19 Control Measures

Control Measures:

- In the event of an emergency evacuation of a site, normal evacuation routes should be followed
- Social distancing should be maintained at assembly points wherever possible, but without exposing persons to the risks presented by road traffic
- **Face coverings should be used at assembly point prevents social distancing**
- In the event of 'dynamic lockdown' or an emergency evacuation the risk presented by the identified hazard (e.g. a fire) should inform the application of control measures described in this risk assessment; the safety of individuals in immediate situation should become the priority.

The Health & Safety manager and the Director with responsibility for H&S will be responsible for the following:

Fire Drills.

- No Fire Drills to be conducted until further notice
- Fire Awareness training via email to staff of the current procedure
- Students will receive instructions on evacuation routes from personal tutors as a part of induction, understanding should be checked
- Visitors should be made aware that no fire drills are to be conducted

Cont.

Fire Alarm tests.

- Fire alarm (bell) test to continue as normal. Conducted at quietest time possible. Advise all staff of test time.

Fire Alarm – real event.

- All staff to follow the fire evacuation procedure but try and maintain social distancing and advise students to do the same while leaving building and gathering in Fire Assembly Points where at all possible

Dynamic Lock Down

- No Lock Down Drills to be conducted until further notice.

Dynamic Lock Down – real event.

- If the Lock Down alert is raised, all students & staff must practice the lock down procedure as instructed but maintaining social distance *if possible*.

Personal Emergency Evacuation Plans (PEEP)

- review all PEEP's and make any necessary changes.

Residual Risk / Further Action Require After Control Measures Applied: (None Identified)

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics: (None Identified)

IDENTIFIED HAZARD 7: Provision of First Aid

Specific factors:

First aiders exposed to Covid 19

Clinical waste not disposed of safely

Existing First Aid guidelines require adaptation

'Patients' are at risk of compromised first aid treatment, due to adaptations made to protect the First Aider

Failure to comply with RIDDOR

Instructions relating to Covid-19:

If a person becomes unwell with a new continuous cough or a high temperature *in the workplace*, they will be sent home and advised to follow the stay at home guidance.

If the patient is not able to travel home by themselves, they are to be relocated into a spacious well ventilated communal area, whilst always maintaining social distancing. They also should be asked to wear a face mask.

Do not contact First Aid in the first instance for COVID-19 symptoms where there is no risk from other injury or medical condition. The incident is to be managed by the tutor / Line Manager / HoD / SLT & the first point of contact (unless a vulnerable person) will escort the patient to the location described above.

The HoD / SLT member will contact the 'patients' family to arrange for them to be collected. In the event that a family member is not able to collect SLT will make a decision about how to proceed.

The Estates team will be instructed to arrange for the patients work area and the place they have been waiting to be decontaminated

Cont.

The employee (first point of contact) will complete a First aid report for the incident as soon as possible (supported by a First Aider if necessary)

If confirmed that any person has developed Covid-19 who was recently on a College site, a member of the Senior Leadership Team will follow the most current DfE Guidance to discuss the case, identify people who have been in contact with them, and will take advice on any actions or precautions that should be taken.

All instances of possible Covid 19 infection to be reported as First Aid incident through the college reporting system. All recorded Covid 19 incidents are to be reported to the SLT by the First Aid lead.

Control Measures related to the Provision of First Aid (Following the 'Hierarchy of Control'):

- Physical contact with a patient should be avoided, and distancing of 2m maintained if at all possible.
- Conversations undertaken with the patient should be at a distance, including questions about symptoms.
- In order to protect the First Aider, it should be assumed that the patient is infected with Covid 19 (although this clearly may not be the case)
- If social distancing cannot be maintained, in order for example to place a patient in the recovery position or to initiate the use of a defibrillator, then PPE must be worn (mask, gloves, goggles or visor, and a plastic apron), and contact minimised (furniture and/or other objects could be used to maintain the recovery position comfortably)
- If Cardiopulmonary Resuscitation (CPR) is required, then this should be limited to chest compressions only, and whilst wearing full PPE, due to patient exhalation. The College does not expect you to undertake 'rescue breaths'/'mouth to mouth' in this context.
- The patient should be given a medical face mask to wear if social distancing cannot be maintained, **unless** they have a compromised airway / breathing difficulties, or state that they cannot wear a face mask (please do not challenge this assertion, at this stage). This is in order to protect both yourself as a first aider, and the patient.
- If a First Aider treats a person who is later confirmed to have Covid 19, then they should self isolate and undertake a test, if it cannot be confirmed that the 'Standard Contact Definition' was upheld.
- Each First Aider (on the duty rota, and Technicians) should be designated their own first aid kit. They should also keep their PPE with this kit.
- If the patient is able to self-assist in the application of dressings provided, then they should be allowed to do so with verbal guidance. As long as a dressing applied by the patient stems any excessive bleeding, you do not need to get involved in placing a 'perfect' dressing.
- Where further medical intervention is likely to be necessary, in the case of a non-emergency, then the patient's family, carers etc. should be contacted to transfer the patient to hospital. The patient should be accompanied to an external door to meet this person.
- Where the patient is not capable of moving independently, then an ambulance should be called, and informed if Covid 19 infection is suspected. This means that ambulances may be called more frequently.
- In the event that an individual has a seizure, where the medical history is well understood, and the seizure is typical (for the individual), then an ambulance should not be called. The 'recovery position' / 'safe airway position' should be employed 'as normal' for someone experiencing a seizure.
- Any clinical waste should be placed into a yellow bag by the patient where possible, and Estates notified to remove.
- All disposable PPE which is not contaminated by the accident/incident should be disposed of immediately in a yellow bin (non clinical)

- Any Disposable PPE (gloves, aprons, face masks) that have become contaminated should be disposed in the Yellow Clinical Waste Bins (Science Lab - Milnthorpe Road. Allen Building Reception)
- Visors and goggles can be cleaned and reused, by the same individual; you should write your name on your visor.
- In the event of bodily fluids being spilled, the standard decontamination kit should be used following disposal instructions, and Estates notified to deep clean the area
- First Aiders should wash hands thoroughly after attending an incident
- **In any incident where a patient says that they may have Covid 19, or symptoms conducive to this, please record this using the exact wording on the First Aid Record Form; and immediately pass to the Lead First Aider.**

Residual Risk / Further Action Require After Control Measures Applied.

First Aid incidents should be debriefed with the First Aider team, to learn from experiences, and implementation of control measures.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Medical risk assessments undertaken for individuals with underlying medical conditions should take account of the guidelines above, and attempt to uphold these, for example through self-medication.

IDENTIFIED HAZARD 8: Learning Support

Specific factors:

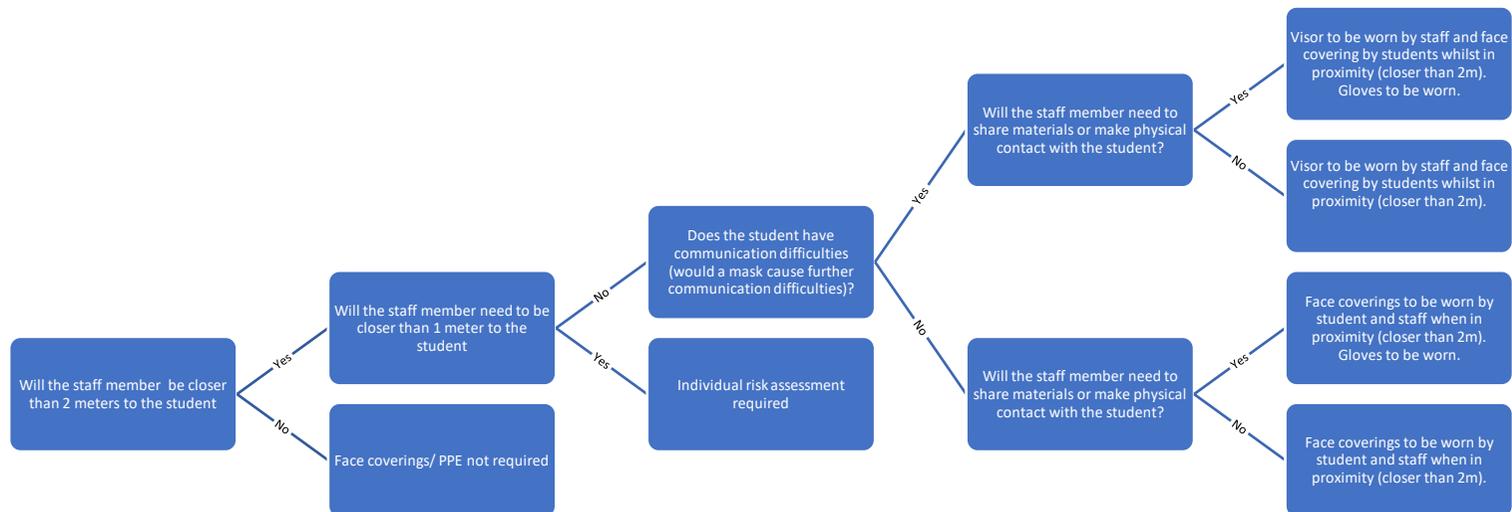
Learning support will be significantly compromised if close contact is not possible

Learning Support Assistants are exposed to Covid 19

Students are exposed to Covid 19

Instructions relating to Covid-19:

SENCOs with support from teaching staff, should apply the following process to determine the PPE required to operate in close contact where this is believed to be essential:



Residual Risk / Further Action Require After Control Measures Applied.

Learning Support Assistants must be provided with appropriate PPE before beginning work, which should also be inspected and cleaned regularly

New PPE should be readily available.

Teachers should informally observe LSA working practices to ensure that this risk assessment is upheld.

Potential Impact on Vulnerable individuals/groups and those with Protected Characteristics

Communication with individual students is compromised due to PPE leading to ineffective support arrangements

Students with a combination of behavioural and special educational needs may struggle to follow instructions, or to enact agreed strategies

HSE Notice to Employees:

Where HSE identifies employers who are not taking action to comply with the relevant PHE guidance to control public health risks, e.g. employers not taking appropriate action to socially distance or ensure workers in the shielded category can follow the NHS advice to self-isolate for the period specified, we will consider taking a range of actions to improve control of workplace risks. These actions include the provision of specific advice to employers through to issuing enforcement notices to help secure compliance with the PHE guidance.