*To help you address the issues in the checklist, we have included comments below on the government guidelines from our National Union with advice on how to make your risk management robust:*

***Welcoming children back to school:***

*UNISON believes it is important that schools and government should have a plan B and equal weight needs to be given to planning for potential lockdowns so to ensure pupils education can continue temporarily from home.*

*We are very concerned that the government thinks that schools can plan to go back with the significant amount of additional work expected, but without more money. UNISON has called for increases in funding and for the debts of all schools to be wiped out as the government did for NHS hospitals.*

*We have said that more work needs to be done on test and trace as in one of UNISON’s recent survey 80% of members did not know how to access the scheme.*

***Purpose of the guidance***

*Once more the government has made schools and local employers responsible for implementing the guidance.*

*Before schools re-open in September, we aim to issue joint union ‘risk assessment checklists’ and clear guidance on individual rights under health and safety laws covering situations where serious failings put staff and pupils at serious and imminent risk*

*The guidance says that it expects schools and trusts to work closely with parents, staff and unions.*

***Section 1.  Public Health Advice***

*Risk assessments must be a priority. Enhanced cleaning should mean additional staff/resources and not be added to other staff duties.*

1. ***Prevention***

*At an early stage, staff and other parents should be alerted so that they can be on the lookout for symptoms in other pupils. The DfE guidance says that PPE is only needed if staff can’t keep two metres away. UNISON is clear that PPE should be available for anyone supervising anyone with symptoms.*

*We believe that all staff should be allowed to test as early as possible after possible contamination, as this will limit potential cross infection.*

*Contamination cleaning should be done by a cleaner or facilities staff with PPE and not by other school staff.*

*Section 3 states that Public Health England does not recommend the use of face coverings in schools.  This does not meet* [*Health and Safety Executive guidance*](https://www.hse.gov.uk/coronavirus/ppe-face-masks/face-coverings-and-face-masks.htm)*which says: ‘If people choose to wear face coverings in work you should support them’. UNISON believes that all staff should be free to choose to wear face mask/coverings and protocols for face coverings should be agreed with schools.*

1. ***Introduce enhanced cleaning, including cleaning frequently touched surfaces often using standard products, such as detergents and bleach***

*UNISON is clear that enhanced cleaning should be done by cleaners and facility staff, who are given the appropriate PPE, not other support staff.*

***How to group children***

*This advice is clearly based on trying to get all pupils back to school and we believe this could undermine the safety of pupils and staff. UNISON is clear that smaller bubbles are best to restrict possible infection spreading and so use of larger bubbles must be rigorously risk assessed.*

***Measures within classrooms***

*Some classrooms and furniture are not built to fit the suggested layout of classrooms so this may be difficult****.***

***Other considerations***

*These sections again call for more cleaning – which means more cleaning time and resources will be needed.*

***6. Where necessary, wear appropriate personal protective equipment (PPE)***

*Risk assessments should decide whether PPE is necessary.  Schools must ensure that they have adequate supplies of PPE available at all times. UNISON believes that staff are best placed to assess their own need for PPE.*

***7. Engage with the NHS Test and Trace process***

*We remain very concerned that the government’s testing scheme is not currently fit for purpose.  It is also important that staff, parents and unions are alerted to any positive tests as early as possible to look out for others who might show symptoms.*

***9. Contain any outbreak by following local health protection team advice***

*Nationally, we have seen some schools fail to inform all staff and unions of COVID cases in the school. Transparency is critical.*

*UNISON believes that when there is a ‘suspected’ case within a bubble the rest of the bubble should move to studying from home where possible until the test result is confirmed. With the promised speeding up of test results this would be a sensible measure to further reduce the potential spread of the virus across the school, hopefully preventing the need for a wider closure of the school.*

***Section 2. School Operations***

***Dedicated school transport, including statutory provision***

*Our view is that pupils should always be expected to wear face coverings on all transport as this will protect drivers, and supplies should be available for pupils who use school transport, along with procedures for disposal and storage. We believe it will be necessary to increase school transport in many areas. Recommendations for staggered start times could cause problems for parents with different aged children in the same school.*

***Attendance expectations***

*Schools should work with anxious families, not fine them.*

***Staff who are clinically vulnerable or extremely clinically vulnerable***

*NJC guidance differs from this guidance. It says that extremely clinically vulnerable people should only return to roles where strict social distancing is possible. Given that the guidance does not require strict social distancing to apply in schools, UNISON believes that staff at increased risk from COVID-19 should be supported to work from home. We recognise that this may mean the employee taking on alternative duties where their current role cannot be done from home. Individual risk assessments are vital in this process.*

***Staff who may otherwise be at increased risk from coronavirus (COVID-19)***

*These workers should be given individual risk assessments to ensure that they are safe to return. UNISON believes that working from home must be supported by the employer where that is the best way of reducing the risk.*

***Supporting staff***

*The DfE’s mental health resources only refer to teachers****.*** *Schools should consider resources that fit the needs of support staff.*

***Staff deployment***

*Schools should also discuss staffing changes with unions.**We think that there will inevitably be more pressure on staff as additional tasks such as cleaning and staggering hours impact on workloads. We believe that the government will need to put more money into schools to increase staff numbers.*

***Deploying support staff and accommodating visiting specialists***

*UNISON has worked with the Education Endowment Foundation in the past to ensure appropriate deployment of staff and so we are happy with their involvement.*

*Suitably experienced teaching assistants should only be asked to ‘lead’ classes in situations known about in advance, for example where a teacher is working from home due to being in a vulnerable group, and where another teacher is not available. Further, suitably experienced teaching assistants are those whose job description already included this occasional responsibility, usually HLTAs (working at levels 4 and 5 according to the*[*NJC model job profiles*](http://www.skillsforschools.org.uk/media/1053/model_school_profiles_teaching_and_learning_support_23jul13.pdf)*), and who are paid at the appropriate grade.*

*Cover supervision may be needed for a teacher’s short-term absence from the classroom where the absence was not known about in advance (for example, to cover short-term sickness). Ideally, to protect the integrity of the class/bubble, the allocated teaching assistant should provide this cover.*

*To undertake cover supervision, TAs should have skills and knowledge of at least level 3 and be paid at the appropriate grade for this level (see the*[*NJC model job profiles*](http://www.skillsforschools.org.uk/media/1053/model_school_profiles_teaching_and_learning_support_23jul13.pdf)*). In this situation there is no expectation that active teaching takes place. Rather, pupils should carry out a pre-prepared exercise under supervision. For more information see our*[*factsheet on cover supervision*](https://www.unison.org.uk/content/uploads/2018/04/24922.pdf)*. Schools should consider contingency arrangements for appropriate cover supervision in their planning.*

***Other support***

*Volunteers should not be used to replace normal jobs****.***

***Catering***

*Currently most schools are delivering a limited catering service. There will need to be detailed planning for any move back to hot meal provision. This will include challenges of social distancing in small kitchens, pupils eating at staggered times and cleaning of shared equipment. Thorough risk assessments will be needed. UNISON believes additional specific guidance on provision of catering in the autumn term is needed.*

***Extra-curricular provision***

*Support staff as well as pupils will move across these areas and that staffing and social distancing will be an issue.*

***Section 3: Curriculum, behaviour and pastoral support***

***Curriculum Expectations***

*If schools can’t get all pupils back in at the start of September or if there are further lockdowns due to local spikes in infection rates, pupils will be required to use online resources again. UNISON believes that all vulnerable and disadvantaged pupils should get the resources they need to learn at home if that becomes necessary. They will need access to books and creative resources, as well as free laptops/wi-fi, provided by the government.*

*UNISON has recently met the national Oak Academy. This is an organisation that provides remote learning. It was set up by teachers to provide online classes and resources. The DfE has now sponsored them to continue their work. Whilst we have some questions about the procurement process that led to their funding, we have no doubt about their intentions. They are keen to work with unions and they are aware that teaching assistants are being used to deliver classes without the necessary support.*

***Catch-up support***

*This money is helpful but spread across over 20,000 schools will not go very far. Schools will need more resources to be able to cope with new demands and the need for pupils to catch up. We also believe that the debts of schools should be wiped out in a similar way that the government did for NHS Trusts.*

***Pupil wellbeing and support***

*Much of this section in the full document refers to teachers – a lot of SEND and pastoral care support is provided by support staff. This is an area that saw significant job losses during the last decade of austerity and additional funding will be needed to support pastoral and outreach work by schools and local authorities.*

***Section 4.  Assessment and accountability***

***Inspection***

*We have called on the government to delay any Ofsted intervention until at least after half term.*

***Primary assessment***

*We have called for assessments to be suspended.*

***Annex A: Health and safety risk assessment***

*This section is key for UNISON and quote in full:*

***Coronavirus (COVID-19) specific***

* *Everyone needs to assess and manage the risks from coronavirus (COVID-19). This means school employers and leaders are required by law to think about the risks the staff, pupils and young people face and do everything reasonably practicable to minimise them, recognising they cannot completely eliminate the risk of coronavirus (COVID-19). School employers must therefore make sure that a risk assessment has been undertaken to identify the measures needed to reduce the risks from coronavirus (COVID-19) so far as is reasonably practicable and make the school COVID-secure. General information on how to make a workplace COVID-secure, including how to approach a coronavirus (COVID-19) risk assessment, is provided by the*[*HSE guidance on working safely*](https://www.hse.gov.uk/coronavirus/working-safely/index.htm)*.*
* *Schools should undertake a coronavirus (COVID-19) risk assessment by considering the measures in this guidance to inform their decisions and control measures. A risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible measures to control the risks in the workplace, and the role of others in supporting that. The risk assessment will help school leaders and employers decide whether they have done everything they need to. Employers have a legal duty to consult their employees on health and safety in good time. It also makes good sense to involve pupils (where applicable), young people and parents in discussions around health and safety decisions to help them understand the reasons for the measures being put in place. Employers can do this by listening and talking to them about how the school will manage risks from coronavirus (COVID-19) and make the school COVID-secure. The people who do the work are often the best people to understand the risks in the workplace and will have a view on how to work safely. Involving them in making decisions shows that the school takes their health and safety seriously.*

***Sharing your risk assessment***

* *Schools should share the results of their risk assessment with their workforce. If possible, they should consider publishing it on their website to provide transparency of approach to parents, carers and pupils (HSE would expect all employers with over 50 staff to do so).*

***Monitoring and review of risk controls***

* *It is important that employers know how effective their risk controls are. They should monitor and review the preventive and protective measures regularly, to ensure the measures are working, and taking action to address any shortfalls.*

***Roles and responsibilities***

* *All employers are required by law to protect their employees, and others, from harm. Under the Management of Health and Safety at Work Regulations 1999, the minimum employers must do is:*
	+ *identify what could cause injury or illness in the organisation (hazards)*
	+ *decide how likely it is that someone could be harmed and how seriously (the risk)*
	+ *take action to eliminate the hazard, or if this isn’t possible, control the risk*
* *Given the employer landscape in schools is varied, we have set out here what the existing DfE*[*Health and safety: responsibilities and duties for schools*](https://www.gov.uk/government/publications/health-and-safety-advice-for-schools/responsibilities-and-duties-for-schools)*guidance states about the roles and responsibilities for health and safety in schools: the employer is accountable for the health and safety of school staff and pupils. The day-to-day running of the school is usually delegated to the headteacher and the school management team. In most cases, they are responsible for ensuring that risks are managed effectively. This includes health and safety matters. Schools must appoint a competent person to ensure they meet their health and safety duties. The Health and Safety Executive (HSE) provides more information on the role of headteachers and employers in the guidance*[*The role of school leaders - who does what*](https://www.hse.gov.uk/services/education/sensible-leadership/school-leaders.htm)*and a simple guide to who the employer is in each type of school setting in its*[*FAQs section*](https://www.hse.gov.uk/services/education/faqs.htm#a1)*, under ‘Who is accountable for health and safety within a school?’. References to actions by employers in this guidance may in practice be carried out by headteachers in schools, but the employer will need to assure themselves that they have been carried out, as they retain the accountability for health and safety. If not already done, employers should ensure that a coronavirus (COVID-19) risk assessment for their school is undertaken as soon as possible. As some pupils are already attending at school, the employer is likely to have gone through a lot of this thinking already. We recommend that those employers use this document to identify any further improvements they should make.*

***Wider guidance on the risk assessment process***

* *Health and safety risk assessments identify measures to control risks during education and childcare setting activities. Health and safety law requires the school employer to assess risks and put in place measures to reduce the risks so far as is reasonably practicable. The law also requires employers to record details of risk assessments, the measures taken to reduce these risks and expected outcomes. Schools need to record significant findings of the assessment by identifying:*
	+ *The hazards*
	+ *how people might be harmed by them*
	+ *what they have in place to control risk*
* *Records of the assessment should be simple and focused on controls. Outcomes should explain to others what they are required to do and help staff with planning and monitoring.*
* *Risk assessments consider what measures you need to protect the health and safety of all:*
	+ *Staff*
	+ *Pupils*
	+ *Visitors*
	+ *Contractors*
* *Schools will need to think about the risks that may arise in the course of the day. This could include anything related to the premises or delivery of its curriculum or activities, whether on-site or in relation to activities offsite.*

***Consulting employees (general)***

* *It is a legal requirement that employers must consult with the health and safety representative selected by a recognised trade union or, if there isn’t one, a representative chosen by staff. As an employer, you cannot decide who the representative will be.*
* *At its most effective, full involvement of staff creates a culture where relationships between employers and staff are based on collaboration, trust and joint problem solving. As is normal practice, staff should be involved in assessing workplace risks and the development and review of workplace health and safety policies in partnership with the employer. Consultation does not remove the employer’s right to manage. They will still make the final decision but talking to employees is an important part of successfully managing health and safety.*
* *Leaders are encouraged to ensure that consultation on any changes to risk assessments that will be in place for the start of the autumn term commence with staff before the summer break, to ensure that those that are on term-time only contracts have adequate time to contribute.*

***Resolving issues and raising concerns***

* *Employers and staff should always come together to resolve issues. As providers widen their opening, any concerns in respect of the controls should be raised initially with line management and trade union representatives, and employers should recognise those concerns and give them proper consideration. If that does not resolve the issues, the concern can be raised with*[*HSE*](https://www.hse.gov.uk/)*. Where the HSE identify employers, who are not taking action to comply with the relevant public health legislation and guidance to control public health risks, they will consider taking a range of actions to improve control of workplace risks. The actions the HSE can take include the provision of specific advice to employers through to issuing enforcement notices to help secure improvements.*

*The section says that employers should consult with health and safety representatives, but we know that in schools we are short of these and so we expect schools to consult with local UNISON branches.*

*We also believe that rather than ‘consider’ publishing risk assessments on websites it should be a priority for schools to reassure pupils, parents and staff that the school is safe.*