

COVID-19 RISK ASSESSMENT FOR CONCORD COLLEGE

Introduction

As businesses prepare to return to the workplace, their core obligation to ensure “so far as is reasonably practicable the health, safety and welfare of employees and the safety of non-employees” remains as does the obligation to risk assess and implement relevant control measures where the risk concerned cannot be otherwise mitigated.

All schools are required to carry out a risk assessment directly addressing risks associated with COVID-19 and safe operation. The UK Government also expects that businesses with more than 50 employees publish the COVID-19 risk assessment on their website.

Advice and guidance

In our preparations to re-open the College and provide as safe an environment as possible from COVID-19 we have accessed guidance from many sources, including government departments, ISBA (Independent Schools’ Bursars Association) and BSA (Boarding Schools Association).

Rationale

The logic behind this risk assessment is the ongoing ‘duty of care’ the College has for our whole community: trustees, staff, parents, pupils and visitors. A 'duty of care' means a legal obligation to ensure the safety and well-being of others.

Running the College – assessing the risk

Assessing COVID-19 is particularly challenging as the outcome of the risk assessment for one group within a school will have an impact on another: teaching staff, support staff, visitors and contractors and students of varying age groups.

The overall assessment of risk will require daily revision and will include:

- updating our safeguarding policy and procedures and ensuring staff and pupils feel safe
- accessing government advice and implementing guidance measures
- communicating changes to staff, pupils, parents and trustees on a regular basis
- controlling access to the College
- applying social distancing measures
- sufficient provision of and access to hygiene materials
- enhancing cleaning regimes
- provision of PPE
- setting external socialising rules
- identifying, reassessing and mitigating all risks as far as is reasonably practicable

The following tables provide a record of the hazards, control measures and outcomes of this risk assessment.

Overall Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
A	Safeguarding policy and procedures not updated and / or staff and pupils not feeling safe.	The safeguarding policy and procedures are reviewed regularly, updated as appropriate and circulated to staff, students and parents.
B	Government advice not being regularly accessed, assessed, recorded and applied.	Daily/regular briefings from BSA, ISBA and other bodies circulated to Senior Management Team and COVID-19 Risk Assessment Group. Government guidance downloaded and circulated as and when updated. Action taken to include updates to guidance in policies and procedural documentation and in information provided to parents, students and staff.
C	Omission of teachers' union representative from information circulation.	The teachers' union representative is included in all information circulated.
D	Changes not regularly communicated to staff, pupils, parents and governors.	Changes are regularly communicated.
E	Changes to assessments, procedures and other important matters not reviewed by governors.	Trustee responsible for safeguarding in regular contact with VP Pastoral for updates. Welfare Committee meet to discuss procedures, policies and documentation. Whole Board included in circulation of documentation and invitation to join committee meetings. Compliance & H&S Committee reviews to be undertaken.
F	Insurers not consulted with school's re-opening and / or amended plans.	Regular contact is maintained with the College's insurers/broker and information is exchanged to provide clarity on our procedures and on our insurers requirements.
G	Suspended services and subscriptions not re-set.	Diary notes being put in place for any suspended services to ensure in place for re-opening.
H	Access to school not controlled effectively and visitor (if allowed) details not recorded.	All visitor access is controlled at the main gate by security officers. Visitors are required to sign in at Reception or Estates. Records are maintained which include vehicle registration numbers, visitor names, who they are visiting, contact details. Sign out procedures are in place. Visitor policy has been updated.
I	Social distancing (SD) and other hygiene rules not communicated, understood and applied.	Posters and signage to be put in place throughout the campus to provide visual reminders of required behaviour. Tutors, teachers and boarding parents to reinforce the messages to their specific student groups. Line managers to regularly reinforce the messages to staff. Circulation to all staff and students of rules, expected behaviour, control measures and mitigation measures in place, with regular updates.
J	Staff and pupils not being reminded and checked to ensure they are complying with hygiene and SD rules.	Posters and signage to be put in place throughout the campus to provide visual reminders of required behaviour. Assemblies for students and staff to be held in accepted bubbles, with social distancing in place or

		via Teams to reinforce the messages on a regular basis. Tutors, teachers and boarding parents to reinforce the messages to their specific student groups. Line managers to regularly reinforce the messages to staff.
K	Insufficient supplies of hygiene materials and not being suitably placed.	A stock of materials is held and orders are placed on a regular basis to ensure supplies are constantly replenished. Provision of and positioning of supplies has been carefully considered to provide ease of access for all and this will be monitored on an ongoing basis. Additional stand alone hand washing stations have been provided and hand sanitising dispensers positioned on all corridors, entrance halls, classrooms and offices.
L	Insufficient or unsuitable cleaning regime - lack of regular re-assessment and revision to high risk areas such as toilets, door handles, keypads, switches, hand rails and regularly used hard surfaces, etc.	Procedures have been put in place to provide regular sanitisation of all hard surfaces. Throughout each day all high risk areas will be cleaned frequently. Check/signature sheets will be positioned on all classroom/lab doors for domestic staff to complete following each clean. In addition classroom desks and chairs will be cleaned between each user. Dining room tables will be cleaned between each user. All domestic staff will be reminded in their daily briefing of the procedures which must be followed. Monitoring will be undertaken to ensure areas are regularly reviewed and any changes implemented to improve protection.
M	No precautions to keep shared teaching equipment (e.g. musical instruments, pens, pointers, keyboards) hygienic.	Industry approved antibacterial spray, surface wipes and hand sanitiser will be provided in all classrooms, workrooms, offices, kitchens and other shared areas. Staff will be instructed on regular use of materials, specifically between each user, to sanitise all hard surfaces and shared equipment/instruments. Cleaning regime will be further enhanced to include a formal logged clean of the teacher area/common touch points/equipment in each classroom which is shared, between each teacher's use.
N	High risk areas not being regularly monitored (including boarding areas) for hygiene.	All pastoral staff will be instructed on strict hygiene procedures to be followed and provision of cleaning/sanitising materials. Daily monitoring will be carried out to ensure compliance. Check/signature sheets are positioned in all toilet areas for domestic staff to complete following each clean.
O	No contingency plans in place for the transition to full opening (or re-closing) including rapidly sharing updates and decisions.	Regular meetings are held by SMT and by the COVID-19 Risk Assessment Group to monitor the changing situation and to update decisions as appropriate, to ensure measures needed to address changes are in place. Decision making is dynamic and communication is swift. Strong communication links with parents, students and staff are maintained.
P	All hazards identified, properly mitigated and regularly re-assessed?	Hazards and control measures are regularly reassessed to ensure appropriate safeguards are in place and to implement changes as needed.
Q	Inadequate COVID-19 testing programmes	Mass PCR testing conducted by approved medical contractor at regular intervals based on re-opening of the school (provided to all staff and students attending the school). Introduction of the voluntary NHS Test and Trace Rapid Lateral Flow Testing programme.

Pupils, Parent and Staff Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Communication channels not working and not being reviewed (e-mail, text, Facebook, etc).	Communication channels are in regular use and any issues are dealt with as a priority.
2	Lack of a robust feedback and reply system to ensure best practice and two-way communications for pupils, parents, staff and governors.	Queries can be raised by direct access to senior staff and to admin support. Communication logs are maintained for all students.
3	No Governor and / or SLT member for school / department nominated to be responsible for COVID-19 matters. Governor / SLT members' contact details not known and not on call.	A named Trustee has responsibility for welfare and safeguarding, including COVID-19. His contact details are available to all, as are those of the SMT.
4	No system to communicate with parents and staff who have not returned to school for fear of infection.	Regular communication is maintained with students, parents and staff to address concerns and provide advice and guidance.
5	Lack of knowledge of where pupils / staff have travelled from (other than home and school).	Quarantine requirements now set by government regarding travel from overseas. Inbound flight details for all boarding students known.
6	Lack of rules / procedures for hygiene standards for staff and pupils – and failure to adequately enforce standards.	Rules and procedures widely and regularly circulated. Monitoring to be undertaken and reminders given by line managers and tutors, teachers and boarding parents. Posters and signage in place.
7	Staff not trained or regularly updated in COVID-19 symptoms, SD and how these rules apply to teaching?	Regular updates provided to staff on COVID-19 symptoms, social distancing and teaching practices. To be reinforced via HoDs, in departmental meetings and in monitoring.
8	School transport not operating to reflect SD, hygiene, PPE and cleaning arrangements.	Risk assessment in place from coach operator. College owned minibuses operated under relevant guidance and risk assessed by Transport Assistant/H&S Officer.
9	At drop-off and pick-up parents remain in vehicles and SD outside gates and entrances.	Parents who drop off their children will be allowed to drive onto campus if they pass the temperature check, but they will not be allowed to get out of their vehicles. This has been communicated to parents by the VPP.
10	Insufficient registration throughout the day including lack of temperature / health checks.	Daily temperature checks in place for all. No access to campus for anyone with a temperature higher than 37.8°C. Student registration maintained to comply with regulatory requirements.
11	Transit spaces (corridors), social zones (car parks, common rooms, playgrounds) not being configured to SD rules.	Corridors will be designated one way where necessary to comply with SD requirements. Any multi use area will be restricted in numbers to accommodate SD.

12	Learning and recreational spaces not configured to SD rules.	Classrooms laid out to accommodate SD. Protective screens fitted where required. Class sizes restricted as necessary. Use of recreational spaces restricted.
13	Lack of consideration of different age groups provided for in timetabling, length of the school day and exposure to other age groups.	Staggered timetabling in place, with staggered mealtimes and breaks. Students grouped into bubbles initially by boarding residence and then by year group where possible.
14	No system in place to deal with bereavements, trauma, anxiety, behavioural issues.	Access to trained counsellors available (independent and internal). Strong pastoral support team in place.

Pupils and Staff - Safety Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Lack of review, update or sharing of safeguarding, code of practice and staff handbook policies.	Student, parent and staff handbooks have been updated with COVID-19 information and circulated. Regular reviews will be undertaken and will be circulated accordingly.
2	DSL and ADSL not easily contactable and their contact information not known to all.	Details of DSL and DDSLs are published, easily contactable and resident on site. Information posters are in place in all boarding residences.
3	Fire drills, routes and assembly points not rehearsed.	Termly fire drills undertaken. Procedures, routes and assembly points fully explained. Information notices posted in all bedrooms.
4	Class sizes not reduced and kept together in their "bubble" (minimising contact with others) or properly supervised.	Class sizes reduced to comply with SD in each classroom. Bubbles created to provide the best SD protection. Supervision will be closely monitored.
5	Needs of each age group and class not considered separately in terms of support, activities and facilities.	Needs considered very carefully, with responsibilities allocated to specific staff.
6	Lack of new staff and pupil induction.	Induction will take place following SD rules and via videos and Teams.
7	SCR and required documents not properly verified or recorded.	Verification of all documentation is being undertaken following current guidelines. SCR being kept up to date.
8	Opportunities for non contact sport and other activities not regulated or considered.	A programme of outdoor activities will be in place to ensure students have sufficient opportunities for exercise, sport and recreation in socially distancing bubbles.
9	Sporting, play and SD rules unclear to staff, pupils, parents and visitors.	Risk assessments and guidelines Provided for all activities.

10	Drama, dance and music activities not applying SD or hygiene rules	Only those activities which can be undertaken following SD and hygiene rules will be allowed to take place.
11	Transit spaces (corridors), social zones (common rooms / playgrounds) not configured to SD rules.	Corridors marked with one-way directional signs, no-entry signs or keep-left signs to minimise congestion. Recreational spaces will be marked similarly and closely monitored to check compliance when used.
12	Classrooms do not reflect SD layout, PPE, screening and regular cleaning rules.	Classrooms laid out to accommodate SD. Protective screens fitted where required. Class sizes restricted as necessary. Rules for cleaning between each class in place.
13	Insufficient hygiene stations at entrances, exits, toilets, classrooms, play areas, common rooms, staff areas etc	Hand sanitiser stations and mobile hand washing stations located widely across campus.
14	Meal times not de-conflicted or possible to achieve SD in the servery and dining areas whilst still providing sufficient nourishment.	Large marquee hired to provide additional space for dining and breaks to maintain SD.
15	Hazards and risks of providing breakfast and after school clubs not understood.	Day students not allowed to attend breakfast or supper for foreseeable future. Allowed to take lunch in bubbles. Change fully communicated to parents and will be reinforced as necessary.
16	Medical advice for vulnerable staff and children not being followed and insufficient support both at school / home.	Risk assessments will be undertaken for anyone deemed vulnerable from COVID-19 and appropriate reasonable adjustments made in line with findings.
17	Pupil and staff mental health and wellbeing not properly considered with individual needs not identified or supported.	Mental health and wellbeing high on the agenda for students and staff with support in place.

Medical Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Science of risk and new variants of virus not understood	College's Senior Nurse regularly briefed on COVID-19.
2	Hygiene rules not effective. "catch it, bin it, kill it" not re-publicised or applied.	Hygiene rules widely circulated and monitored.
3	Insufficient medical staff to deal with temperature testing, isolating and monitoring suspect COVID-19 cases, outside appointments and normal medical issues.	Designated COVID medical centre has been set up with triage unit and isolation pods. Additional members of staff have been appointed to help provide cover and to ensure that the team is not overstretched to cope with usual day to day medical issues. .

4	Lack of school decision regarding the level of PPE required for pupils and staff. Insufficient training, face fit testing, use, care and disposal arrangements.	Supplies of PPE in place. Full instruction will be provided regarding the use, fit, care and disposal of PPE.
5	Sickness management rules and the “don’t come to work if you are ill” not understood or observed.	Detailed guidance issued to all staff. Line managers to monitor and report concerns.
6	Lack of knowledge on whom has been tested (positive or otherwise) for COVID-19 and if it is recorded (for elimination purposes).	The College has already arranged and will continue to arrange for all staff and students to be PCR tested for COVID-19 over a series of dates to coincide with the re-opening of the College following any holiday periods or national lockdown periods. Records to be maintained of these and independent tests undertaken, in line with GDPR. During January 2021 the voluntary NHS Test and Trace Rapid Lateral Flow Testing programme will be introduced.
7	Insufficient information on which staff or pupil(s) have had contact with anyone tested positive or suspected of COVID-19 and if recorded and actioned.	Records to be kept on those in contact with positive tests/those with symptoms and action taken as necessary.
8	Insufficient proof of shielding and individual conditions?	Proof to be provided/requested of shielding and individual conditions to ensure the College’s response and risk assessments are appropriate. All sensitive data to be kept by HR and handled in accordance with GDPR.

Boarding Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Boarding policies and procedures not updated, regularly reviewed and communicated.	All boarding policies and procedures have been updated to include reference to COVID-19 and circulated.
2	Boarding staff have inappropriate PPE, cleaning materials and training for tasks.	All boarding residences have a supply of PPE and cleaning materials and staff will be trained in their use.
3	Procedures for welcoming back overseas pupils not applied.	Detailed plans are in place to welcome our students back. Coach transport from Heathrow will be provided. Boarding residences will be ready for their return. They will be fully supported and guidance on new procedures will be explained.
4	Insufficient space and resources for isolating overseas pupils (for 2 weeks) on their return.	All boarding students will be placed in quarantine for a period of 5 or 10 days on arrival in their single study bedrooms. Arrangements for fresh air and exercise are in place.

5	SD, separation and socialising rules not adhered to in the boarding house.	Students will be placed in bubbles and will be required to maintain SD. The rules will be explained fully and Boarding Parents and Boarding Assistants will monitor practices within the boarding residences, taking appropriate action if the guidance is not followed.
6	Rules and procedures for exeat, trips and activities, appointments or visits from family and / or guardians not complied with or understood.	During any lockdown period or while there are concerns that the level of risk is high due to the number of cases in the region/country and a high level threat of spread, no trips off site will be permitted, other than in an emergency situation. This will be regularly reviewed and will not be lifted if it is determined that additional protection is needed regarding exposure in the wider community. All activities during this time will take place within the confines of the campus. A programme of activities will be provided to enable students to exercise and enjoy free-time. Visits by family members will only be allowed on campus under strict conditions and prior authorisation by SMT. Parents and other members of family will not be permitted to enter boarding residences.
7	Fire instructions and new procedures not reviewed, understood or rehearsed.	Instruction on fire safety forms part of INSET for all staff at the beginning of each academic year. This year delivery will be via video and Teams and will include any new procedures.
8	Fire drills, routes and assembly points not rehearsed.	Procedures fully explained and information notices posted in all bedrooms. Support from Boarding Parents in place.
9	Insufficient bathroom facilities if bed spaces have been reconfigured.	Sufficient bathroom facilities have been maintained, and improved in areas where double rooms are restricted to single occupany only.
10	Boarders not equipped with authorised equipment to stay-in touch with parents.	Students will be able to use their mobile phones, connecting to the College's internet as required. All bedrooms have wireless access points.
11	Boarders aware of global news and how it may affect them or their family.	Students can access the internet and news sites on their mobile phones. Filtering is in place to restrict access to unacceptable sites with regard to safeguarding. There are also interactive information screens which can be configured to provide access to news stories.

Support Staff Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Support staff not briefed on changes regularly.	Regular meetings are held and information posted on notice boards. Updates are circulated.
2	Support staff have insufficient/inappropriate PPE, cleaning materials and training.	All support staff have access to appropriate PPE and training. Supplies of and access to cleaning materials are maintained.
3	Cleaning regimes not reviewed or inspected regularly and not conforming to revised hygiene rules.	Random and regular spot checks will be carried out across the College to ensure compliance.

		Regimes will be reviewed regularly.
4	Reconfigured areas, zones and routes hampering fire exits and routes.	No fire exits will be compromised with the introduction of movement restrictions in buildings (one-way systems).
5	Fire and other emergency procedures not reconfigured, routes not clear or regularly inspected.	Fire and other emergency procedures reviewed on a regular basis and adjustments made to accommodate COVID-19 specific requirements, such as SD. Routes are checked regularly and issues are reported to the H&S Officer. Regular checks are made to ensure routes are kept clear.

Facilities Management Risk Assessment in the COVID-19 Environment

	Hazard	Control Measures
1	Insufficient heating and/ or cooling system (including insufficient fuel levels if applicable).	Boilers all serviced. BMS (Building Management System) in operation and checked daily for any faults. This is serviced annually. Oil levels checked on a weekly basis and replenished on a top-up basis. Supplies stable.
2	Insufficient gas supply, venting and valves?	LPG gas tested by a competent contractor. Gas supply stable.
3	Air conditioning units, ducts not checked on re-occupying school facilities.	Air conditioning serviced by a competent engineer.
4	Ventilation and extraction systems not checked.	Filters changed in accordance with specification frequency. Extraction cleaned biannually. Measures are being taken to increase ventilation in areas where there is no mechanical system in place. All systems in place have been checked for compliance with fresh air inflow requirements and changes made to introduce this where possible. Any air recirculation systems only to be used where fresh air intake is available through separate means. Where this is not possible, such systems to be made unusable to prevent non-compliance.
5	Electrical tests not up-to-date including emergency lighting and PAT.	Ongoing PAT carried out. Emergency lighting checked on a monthly basis.
6	All electrical equipment bought in to school PAT tested?	PAT testing on student owned items will be undertaken during the autumn term (or spring term for January arrivals). Any items brought into College by staff are tested and recorded.
7	Water testing for temperature, flow and legionella not in date for test.	Water temperature testing carried out on a monthly basis.
8	Water supply not tested for legionella on re-opening facilities.	During College closure from March-August 2020, staff purged all water systems on a weekly basis (hot and cold) for 5 minutes. Water systems are checked and purged weekly in unoccupied rooms. Competent contractors chlorinated all water tanks and associated pipework in August 2020. Water samples were taken and sent to the laboratory for testing.

9	Swimming Pool not secure or inspected regularly.	The swimming pool is currently closed.
10	Insufficient arrangements for the operation, cleaning (and use) of the swimming pool.	The swimming pool is currently closed. The Pool Plant Operator takes daily water checks and maintains a cleaning regime. Pool will only be used under strict controls and in accordance with government guidelines.
11	Fire alarm panel, system and extinguishers not in date and not serviced.	Servicing of fire alarms and extinguishers up to date. Full service undertaken in July. Fire alarms tested on a weekly basis, including during closure.
12	Kitchen not reconfigured, stocked and cleaned if closed over a long period.	All equipment was switched on and checked for operation on a weekly basis during closure. A full cleaning schedule took place prior to re-opening in September 2020. Food orders are placed in a timely manner to ensure sufficient stock.
13	Insufficient chefs, supervising staff and cleaners to maintain high standards of hygiene.	A full complement of catering staff are working on a rota system. Cleaning schedules have been increased to ensure safe hygiene practices. Additional staff are recruited as needed. Disinfection of surfaces between users to be given priority.
14	Servery and dining room rules not properly considered, inadequate or safe.	Arrangements for staggered mealtimes and social distancing in place. All food to be served by staff wearing appropriate PPE; no self-service, all utensils to be handled by catering staff only to prevent spread of any infection.
15	Insufficient drinking supplies and hydration available in dining room.	Mains water fountain cooler regularly serviced by competent contractor. Drinking directly from fountain option to be turned off. Lever operation for the filling of water bottles to be the only option, to reduce contamination.
16	Laundry wash and dryers not serviceable, unable to cope with demand, temperature requirements and insufficient wash products.	All equipment is new, following the full refurbishment of the laundry in 2019. If demand dictates, hours of operation would be extended. Contract in place for regular supply of washing products.
17	Waste procedures not reviewed or sufficient.	Procedures for safe handling, disposal and collection of waste in place and monitored on an ongoing basis. Clinical waste receptacles distributed across College to accommodate safe disposal of masks and other disposable PPE.
18	Pest control services not recorded, deficiencies not identified or actioned.	Pest control contractor visits on a twice monthly basis. Full records maintained of services and action taken. Regular checks have been maintained during closure.
19	School vehicles not fully registered, insured, maintained and stocked with appropriate hygiene materials.	All vehicles are checked by the Transport Assistant and records maintained. Full issue of hygiene supplies will be provided in all vehicles and strict routines will be in place.