

Contingency Planning Arrangements for Primary and Special Schools for 2020/21 School Year

Key Issues for Consideration **May 2020**



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The INTO welcomes the opportunity to submit our key issues for consideration concerning planning for the 2020/21 school year, in the context of the COVID-19 emergency. We acknowledge the road map set out by the government for easing COVID-19 restrictions in a phased and gradual manner over the May to August period. However, we also recognise that the reopening of schools (when safe to do so based on public health advice) will take place in the context of continuing restrictions to prevent the spread of the virus and that measures must be put in place to ensure that schools are safe for pupils and staff.

This document identifies the key issues of concern to INTO members which will require consideration in advance of schools reopening in order to provide ongoing support to schools during the COVID-19 crisis. It is envisaged that these issues would be considered in the context of a working group with key relevant stakeholders. Given the particular issues related to primary and special schools, the INTO believes that the DES would be greatly assisted in this work by engaging with INTO and other primary stakeholders separately from the second level sector. This plan will need to be informed by the advice of public health experts.

The INTO engaged in extensive consultation with members in the period 24 April to 5 May, culminating in a wide-ranging discussion at a meeting of our Central Executive Committee (CEC) on 6 and 7 May. We acknowledge the extensive contribution of our members in drawing up this document. It also draws on the [Return to Work Safely Protocol](#) published by government and advice and guidance from the WHO, HSE and our colleague unions at home and abroad. (See Appendix 1)

Principles Underpinning a Return to School

The INTO is seeking agreement on several **principles** governing the operation of schools/education provision during the COVID-19 period, including that:

- Priority must be given to the safety and physical/mental health and wellbeing of staff, pupils and parents in primary schools;
- Children's learning and development, including their wellbeing, must be supported by schools and relevant support services such as NEPS and CAMHS which must be increased to cope with the needs of school communities;
- A collaborative approach to developing and implementing procedures and protocols at a national level is essential. Individual schools cannot be asked to develop their own guidance;
- All key decision-makers should approach the health, safety and wellbeing of each other with compassion and understanding;
- That adequate resources will be allocated to schools by the DES to implement the comprehensive health and safety measures required for schools to operate safely; and
- There must be an acknowledgement that for the duration of the public health crisis, there will be a need to accommodate a changing school environment. This must be taken into account by the Inspectorate, NCSE and other DES sections and agencies. It will be necessary to suspend inspections and initiatives other than those which are aimed at contributing to the school's efforts to maintain the health and wellbeing of the school community for the period of the crisis.

Need for Public Health Advice

We believe the following **public health issues** should underpin preparations in advance of the reopening of primary and special schools:

- That comprehensive public health advice is available to parents and teachers to indicate that it is safe for schools to open and a comprehensive media and public information campaign is carried out to assure parents of the safety of the public health situation;
- The need to ensure that before any proposed reopening of schools, comprehensive testing and contact tracing systems are in place to contain future outbreaks of COVID-19 and provide reassurance and protection for staff, parents and pupils. Because teachers will be at greater risk of infection on return to school, we seek priority access to testing for teachers as part of a community testing programme;
- Decisions on how many children and staff a school can safely accommodate must be made in line with recommendations of public health experts and the HSA, in consultation with the BOM of the school. Because classroom size varies from school to school, there must be clear unambiguous guidelines on the number of square metres of classroom space required per pupil;
- Clear guidance on the appropriate levels of personal protective equipment (if any) for use in different settings in schools, including special schools. Any such equipment must be procured centrally and supplied in sufficient quantities by the HSE/DES to schools in advance of need; and
- Clear occupational health advice for teachers and other staff in schools, including pregnant women and those in at-risk categories.



For these reasons, we believe that public health experts will need to be available to the DES and the stakeholder group.

A Safe Environment for Staff and Pupils

- Schools must have **adequate notice** of reopening, including a period where the BOM and staff can access the building in advance to make suitable preparations;
- **Appropriate guidance, resources and support** must be provided to schools from the DES/HSE/HPSC/HSA followed by a health and safety audit by the board of management(BOM)/ETB to ensure that measures are in place **to prevent the spread of the virus**, including:

Cleaning and hygiene

- That an appropriate and robust cleaning regime is in place, in advance of return and at regular intervals to prevent the spread of the virus; schools will require cleaners to be present during the school day to maintain levels of cleanliness.
- Clear and straightforward guidance must be provided to school cleaning staff about cleaning practices which meet the advice of public health and which will instil confidence in the school community. Training for cleaners will be required.
- Extra funding will be required for the additional cleaning;
- That appropriate facilities are in place to accommodate good hygiene practices, e.g. access to warm water, soap, hand gel; and disposable paper towels. Additional funding will be required.

Physical distancing

- There is a clear acknowledgement that it is not possible to observe physical distancing in a primary/special school setting as it is in shops, factories and other workplaces, particularly among younger children, including those starting school and some children with special educational needs. This is a matter which is of huge concern to our members.
- Appropriate measures should be in place to maximise and assist children with physical distancing, including providing for smaller class groups, floor markings, removal/rearrangement of furniture, arrangements for assembly and dismissal, arrangements for playing, one-way access systems, access to toilets etc.
- Given the current guidance of physical distancing, it will be necessary for almost all schools to reduce the number of children attending at one time. This will pose huge organisational challenges for schools and clear communication with parents will be necessary.
- Guidance and checklists should be provided to schools to assist in putting these measures in place. Appropriate signage and visual reminders (in multiple languages where necessary) should be provided to schools to remind pupils, staff and essential school visitors of good practice in preventing the spread of the virus.
- Lesson plans should be developed to teach and reinforce the concept of physical distancing to pupils.
- A restriction on visitors should be put in place, and arrangements put in place for controlled access for essential visitors. A list of essential visitors and procedures for dealing with them should be supplied to schools; and
- Staff, pupils and essential visitors should have access to any protective equipment (e.g. masks) which are recommended by public health advice and such equipment to be centrally procured by DES/HSE and provided to schools.

Preventing/dealing with a case of COVID-19 at school level

- All staff who are not on CoVID-19 leave (see below) should be asked to complete a questionnaire/self-declaration (on the date of return) stating that to the best of their knowledge they have no symptoms of COVID-19, are not in self-isolation or awaiting the outcome of a COVID-19 test;
- All parents should be asked to complete a declaration (on the date of return) stating that to the best of their knowledge their children have no symptoms of COVID-19, are not in self-isolation or awaiting the outcome of a test;



- A clear non-negotiable protocol must be developed centrally and put in place in each school, in line with Section E4 (pg 11 and 12) of the [Return to Work Safely Protocol](#) for dealing with a suspected case of COVID-19 in the school.
- Where the BOM/ETB believes, following an assessment, that the school cannot provide a safe environment for staff and pupils during the current emergency, they must determine what steps would need to be taken to create one. If after all appropriate actions have been taken, including having sought advice from the Health and Safety Authority/DES, the school cannot provide a safe environment, then the school must remain closed. In this case, the school will continue to support pupils learning at home until the BOM believes it is possible to comply with the requirements to reopen the school safely.
- COVID-19 provisions must be included in the school health and safety statement with templates, with instructions and checklists, provided by the DES well in advance of a school reopening;
- That an induction process, using different media, be developed for both parents and staff to ensure that all are aware of the measures in place in schools to prevent the spread of the virus. Both parents and staff should be required to engage with the process in advance of schools opening; and
- All schools must be given clear guidance regarding specific inclusions in the school's code of behaviour and parental involvement policies to deal with deliberate and/or repeated breaches of social distancing rules by either pupils and/or parents.

Teacher Return to Work – Conditions of Employment Issues

Teachers will understandably be very concerned about a return to their workplaces. They have been working in their homes providing support for pupils' learning, caring for their families and perhaps having suffered bereavements and other stress as a result of the COVID-19 emergency. They must feel reassured that they are returning to a safe workplace, as outlined above.

Teachers will also require clarification concerning some conditions of employment matters including:

Access to COVID-19 leave (paid substitutable leave, not counted as sick leave)

Under [DES Circular 0024/2020](#) "an employer may grant special leave with pay to an employee where appropriate HSE or medical confirmation of COVID-19 diagnosis or recommendation to self-isolate or to restrict his/her movements is provided," The provisions and conditions to be met for accessing such leave must be clarified. For example, if a teacher is well, but self-isolating or recommended to restrict their movements, can they work from home or should they be on leave? Clarification is also required on what if, any, role Medmark, the teacher's own doctor or self-declaration forms play in making an application for COVID-19 leave?

Teachers in at-risk groups (defined by the HSE to include over 60's, those with long term medical conditions, those with weak immune systems)

[DES Circular 0024/2020](#) states that "An employee should self-declare where he/she considers there is a high risk of serious illness from COVID-19. Where the employee is not ill, the employer should prioritise alternative working arrangements e.g. working from home." Such teachers should be permitted to work from home. Clarification will be required in relation to the process for teachers in this group, and how schools can operate if a significant cohort of teachers is in this category. Appropriate supports must be made available to this cohort of teachers to facilitate remote working, for example, ICT facilities.

Teachers who are pregnant

It is acknowledged that there are currently no HSE restrictions or guidance for pregnant women, beyond that in place for the general population. However, pregnant women are, appropriately, often anxious about their own health and protective of their unborn baby. Current guidance for healthcare workers is that "Pregnant health care workers should therefore be allocated to patients, and duties, that have reduced exposure to patients with, or suspected to have, COVID-19 infection". DPER Guidance on leave makes no reference to pregnant workers. We seek a specific clarification from the public health authorities of the level of risk – or of additional risk if any - to pregnant teachers.



Section 13 Chapter 2 of [DES Circular 0052/2019](#) provides for health and safety leave for pregnant women if, where following a risk assessment, a safe place of work cannot be provided. We seek clarification as to how COVID-19 related concerns will be dealt with in this context.

Teachers with childcare responsibilities

While crèches and childcare facilities are scheduled to reopen in advance of schools, there may be disruption to teachers' childcare arrangements due to capacity issues in schools/childcare settings and the cocooning of grandparents/others who may be providing care for children. In addition to this, there may be staggered/limited pupil numbers in schools and this will contribute to child care issues. We note that this issue has been very contentious for unions representing health care and other essential workers who cannot work remotely during the crisis. Given the demographic of teachers, and the requirement that an adequate cohort of teachers will need to be in attendance in schools to facilitate pupils attending, urgent clarification is required on this matter.

Teachers living with/caring for vulnerable people

Currently, the HSE advises that those caring for at-risk people should follow the advice on protecting yourself from COVID-19 (currently – staying at home, seeking medical advice if unwell, practising good hygiene and social distancing). The advice on staying at home would change if schools were to be reopened as an essential service. The DPER FAQs on leave makes no specific provisions for this category of public servant. We are seeking clarification on this matter

Staffing issues

It's clear that the changes which will be required to ensure that schools reopen will require a full level of staffing, including substitution for all absences. In addition, and in line with DPER guidance, certain categories of teacher, eg those in at-risk groups will need to be accommodated with working from home. Clarification is required as to how this would operate. Confirmation is also required that teachers can continue to apply for, and avail of leave of absence, including EPV days and other brief absences as per current circulars.

Arrangements must be put in place to accommodate unplanned teacher absences. There must be clear direction as to how a principal will respond if a teacher is unable to attend school because of illness.

Specific protocols/guidance will be needed for some categories of teachers above and beyond that needed for the general teacher population. These include HSCL coordinators, SETs who are shared between schools, substitute teachers who go from school to school.

Teachers may need increased emotional/wellbeing support to deal with both their own and their pupils' emotional needs at this time. It is important that the teachers' wellbeing service, [Inspire Wellbeing](#), is geared up to provide this

The INTO has been seeking clarification and guidance from the DES over the past month about making appointments in the context of travel and physical distancing restrictions. This guidance is urgently required if schools are to have a full complement of staff for school reopening in September. Clarification is also required that schools will not be penalised from a staffing perspective if the full cohort of pupils has not returned to school by 30 September.

Special schools and classes

Members working in special schools and classes have expressed very specific health concerns, both for themselves and their pupils. Teachers also appreciate the huge need for support for these children and their parents. In some special schools, many children are in the at-risk category and specific advice will be required for their parents in advance of a return to school.

Teachers have expressed great concern for their own safety and the safety of other pupils in situations where pupils are unable to adhere to physical distancing measures. Guidance and support will be urgently required by schools in these cases.

Special schools and classes also require guidance in relation to PPE, and also for staff involved in intimate care. School transport concerns are very acute for this sector.



School leadership issues

As the day to day managers of schools, principals (in conjunction with their leadership teams) will play a central role in implementing, explaining and managing the procedures to be adopted at school level. It is vital that guidance on procedures is issued centrally, and that it is sufficiently clear to be implemented consistently in all schools. Briefing/training for principals will be required. This is not a time for emphasising the autonomy of schools or relying on BOM's and their representative bodies to take responsibility on an individual basis. The government has prescribed individual and institutional behaviour during the delay phase of the COVID-19 crisis and must continue to do so in the context of schools reopening. In that regard, increased funding must be made available for training. All absences for any training must be substitutable.

Boards of management will also require additional financial and human resources to run their schools in the changed context. Principals will require time to prepare for reopening, including flexibility in the use of Croke Park hours/staff meetings for preparatory work. Teaching principals will not be able to manage the changed reality in schools and teach their classes at the same time. Arrangements must be made for teaching principals to allow them to attend to the additional responsibilities which will fall on them. In large schools, deputy principals may require some administration time to assist the principal with this.

School leaders spend a great deal of time responding to the demands of the DES and other agencies, in terms of reporting and accountability. This should not be a priority in the initial phase of school reopening. The DES should make it clear to all principals that health and safety issues and the well-being and educational needs of the pupils take precedence over everything else and suspend the introduction of planned changes to the system and all non-essential paperwork for the duration of the COVID-19 crisis.

School leaders and BOMs will need clear unambiguous protocols regarding non-teaching staff – SNAs, caretakers, secretaries – who are unable to attend work because of COVID-related issues.

Pupil learning and welfare

During our consultations, members exhibited a deep concern for their pupils and their welfare. While teachers have made huge efforts to support pupils' education, teachers are aware that all pupils have not been living in the same circumstances while schools are closed. When schools reopen, additional resources and supports will be required in schools from NEPS, NCSE, CAMHS and TUSLA to address social, emotional and behavioural needs which have not been addressed, and indeed may have been exacerbated during the school closure. These needs will be particularly acute for pupils in special schools and classes and DEIS schools.

Teachers will need to utilise their professional discretion to adapt the curriculum to meet the educational needs of their pupils. All pupils will require additional support in the area of well-being and SPHE. Some other curricular areas may need additional time on returning to school. If pupils have reduced time in school as a result of social distancing measures, teachers will need to prioritise aspects of the curriculum according to the needs of their pupils. In addition, there may be a requirement for the continuation of learning at home for some pupils with particular health needs. Teachers should be trusted to exercise their professional judgement, under the guidance of their principal, and with advice from the appropriate agencies.

There will also be a need to identify areas of learning that can be better addressed through distance learning. Schools will need to operate physical distancing and in line with public health advice about children in at-risk categories, so not all children in a class will be able to attend and distance learning will remain as a feature of practice for the time being. Arrangements must be put in place to accommodate this. Teachers cannot be expected to provide remote teaching/learning for pupils at home after or alongside teaching the pupils who are attending school.

Clear advice and guidance for parents about supporting their children will be required. For example, consistent guidance and communication with parents about pupil progression should be developed. Expectations of schools, for example in relation to the ability to teach all parts of the curriculum and/or extra-curricular activities may need to be spelt out to avoid conflict. Parents must also be given reassurance that pupils who cannot attend school due to COVID-related issues will not be subject to EWO referrals.



Conclusion

The INTO is keen to ensure that our members can be confident that, when they return to school on a full-time basis, their return will be to working environments where every precaution and practical step has been taken to protect both themselves and their pupils from COVID-19. We seek firm assurances that schools are not reopened prematurely and then might face a second period of enforced closure, which would only compound an already difficult situation. The entire INTO membership is up for the challenge of re-starting the formal school system but expects that its views will be taken account of and its concerns addressed. We look forward to discussing all of these issues thoroughly in the proposed stakeholder consultations in the coming weeks.

Appendix 1

Reference Material

- [Return to Work Safely Protocol](#) – Department of Business, Enterprise and Innovation
- [FAQs on COVID Related Leave in the Public Service](#) – Department of public Expenditure and Reform
- [COVID Related Advice for Employers and Employees](#) – Health and Safety Authority
- [Considerations for School Related Public Health Measures in the Context of COVID-19](#) – World Health Organisation
- [COVID-19 Advice](#) – Health Service Executive
- [Guidance on Reopening Schools and Education Institutions](#) – Education International
- [Corona Virus Advice](#) – National Education Union (UK- NI)