

Practical Guidance for Further and Higher Education for Returning to On-site Activity in 2020

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Introduction

The Government / HSA Return to Work Safely Protocol (further referred to in this document as ‘the Protocol’), published on the 9th May 2020, sets out the steps that employers and workers must take before a workplace reopens and while it continues to operate. It is designed to support employers and workers in adapting their workplace procedures and practices to put measures in place, in compliance with the COVID-19 related public health protection measures identified as necessary by the HSE, that will prevent the spread of COVID-19 in the workplace as the economy begins to open up, following the temporary closure of most businesses during the worst phase of the current pandemic.

Arising from the publication of the Protocol, the further and higher education sector stakeholders communicated a request for additional expert guidance as to how the principles and requirements set out in the Protocol should be applied to deal with some specific difficulties, issues and challenges which will arise for the further and higher education system in order to safeguard the health and safety of students, learners, visitors and staff.

On the basis of specialist expertise available to the Department for this purpose, specific issues were identified by stakeholders arising from the Protocol where more granular, expert advice would add value in the application and implementation of the guidance contained within the Protocol in the context of the various contexts, environments and scenarios in further and higher education and campus settings.

These sector-specific issues have been collated by the Department and have been considered by the specialist expertise available to the Department. Guidance in relation to those issues is set out in the following pages. This advice is not intended to be prescriptive. Any unique approach being proposed by an institution should be the subject of a comprehensive risk assessment to be carried out by that institution and should be considered in the context of each institution’s existing obligations as they relate to current health and safety regulations and currently available public health advice. The guidance also outlines some possible options which institutions may consider implementing, having regard to their individual requirements and settings.

The Department continues to engage with health authorities and this guidance may be revised on foot of that engagement. Additionally, as the public health advice evolves over the coming months, the guidance provided may require to be

revised. Moreover, additional further and higher education-specific issues may be raised which will require further clarification and guidance. In that context, it is anticipated that this document will be an iterative document, changing and adapting as necessary to reflect the up-to-date public health advice as the country moves through the reopening phases as set out in the Roadmap to Reopening Society and Business.

1. PHYSICAL DISTANCING

Physical distancing on-campus

Physical distancing is an important part of the country's delay strategy to slow the spread of COVID-19 and to limit transmission of the virus. It does this by minimizing contact between healthy individuals and potentially asymptomatic, presymptomatic or mildly symptomatic individuals. In Ireland, this advice has proven to be effective in reducing the incidence of the virus and protecting those most at risk in Irish society. The current health advice, as reflected in the Protocol, is that the recommended distance to be maintained between people to minimise risk of transmission is 2 metres.

In that context, higher education and further education facilities are advised that physical distancing of 2 metres be maintained. The impact of physical distancing on capacity of teaching areas is acknowledged, however, this impact may be attenuated through staggered provision of classes/lectures, a widening of opening hours and other sectoral and context-specific measures approved by government within public health guidelines.

Holding of Graduation Ceremonies

Any non-essential or unnecessary traffic onto a higher education or further education and training campus should be avoided. In that context, it is strongly recommended that graduation ceremonies which had been scheduled to take place in the autumn, should be postponed or replaced with virtual ceremonies. Institutions may consider holding multiple small, brief graduation ceremonies in venues which can accommodate 2m physical distancing requirements during periods where other students are not mingling with attendees (e.g. during mid-term breaks, reading weeks or through physical delineation of separate areas inaccessible to regular campus or institutional staff or students). Institutions considering this action should perform a specific risk assessment and ensure compliance with all public health advice.

Educational trips, field work and facilitation of visiting students and teaching staff

Educational trips and field work, where there is not an overnight accommodation aspect and where physical distancing can be maintained, may be undertaken but will require individual risk assessment on a case-by-case basis by institutions. It will be necessary to keep a record of attendance and of close contact groups.

Visiting students and teaching staff should be advised in advance of the current public health advice in operation. Please refer to Section 4 International Students for guidance in relation to visiting students and teaching staff from abroad.

Potential for flexibility in physical distancing requirements

It is envisaged that as the country progresses through the stages set out in the Roadmap to Reopening Society and Business, that a relaxation in physical distancing requirements may be made. In that context, the guidance outlined in this document will be revised to reflect any such relaxation. However, institutions should be prepared for the possibility that, depending on the level of transmission recorded, any relaxation of physical distancing requirements may also be reversed.

This guidance reflects the position with regard to the public health advice currently available. However, recognizing the implications for the sector of current physical distancing requirements, the Department continues to engage with the relevant health authorities in relation to the potential for flexibility in regard to the current physical distancing recommendation in the further and higher education context.

2. FACE COVERINGS

The current public health advice is that face coverings are recommended in situations where it is difficult to practice social distancing such as on public transport, in retail settings and in crowded indoor public places. In a further and higher education setting, high numbers of staff and students move across campuses during the course of a normal day. In that context and from a practical point of view, there may be portions of further and higher education campuses where physical distancing cannot be maintained or where individuals may be occupying an enclosed indoor space with others for a prolonged period.

While emerging science varies in relation to the benefits of wearing face coverings to curb the rate of COVID-19 spread, health advice currently advises the wearing of face coverings in instances where it is difficult to practice social distancing such as on public transport and in crowded public spaces such as retail stores and supermarkets.

In line with this advice, further and higher education institutions may advise staff and students that the wearing of face coverings is recommended where it is difficult to practice social distancing, particularly in instances where very close contact

cannot be avoided i.e. direct instruction requiring proximity of less than 1 metre. It should be noted that the wearing of face coverings is an additional measure to other public health guidelines which must also be followed such as hand washing, respiratory etiquette and physical distancing requirements (where possible) and is not a substitute for correct working practices. In addition, the health advice also acknowledges that face coverings are not be suitable for all individuals, for example those with breathing problems or with special needs. Where such a recommendation is made, information must be widely available, either in the form of information posters or specific training, to inform staff and students of appropriate guidelines in relation to the wearing of face coverings e.g. washing hands before putting a face covering on and after taking it off, avoiding touching the face covering while wearing it, correct removal and disposal etc. Advice from the Department of Health on the safe use of face coverings can be found [here](#).

As highlighted above, the wearing of face coverings is an additional measure to other public health guidelines which must also be followed such as hand washing, respiratory etiquette and physical distancing requirements (where possible).

In specific instances where close proximity to other people cannot be avoided e.g. in small laboratory groups, hairdressing instruction in a further education setting, a recommendation that face shields may also be worn is advised. Where proximity of less than 1 metre is envisaged/required, a face mask and a face shield may be recommended. Face shields may also be considered in place of face coverings in the teaching context, particularly if teachers or lecturers have concerns around voice projection or if there is a requirement for students to see their face etc.

Any changes in the national public health advice in relation to the wearing of face coverings should be reflected at institutional level and policies revised accordingly.

3. VENTILATION

The Protocol states that air conditioning is not generally considered as contributing significantly to the spread of COVID-19. Where practical, open ventilation is recommended for areas other than toilet areas with the general advice being to supply as much outside air as reasonably possible.¹

¹ The Federation of European Heating, Ventilation and Air Conditioning Associations (REHVA) has produced guidance on how to operate and use building services in order to prevent the spread of COVID-19 in the workplace which may be helpful and can be accessed [here](#). There is also a supporting webinar developed by REHVA available [here](#) which may be of assistance also.

4. INTERNATIONAL STUDENTS

International students are an important part of the further and higher education sector, increasing the social and cultural diversity of the sector as well as enriching the research and learning environment. In addition, fee income from international students is an important funding source for many institutions. As a result, institutions are seeking guidance in relation to enrolling international students for the next academic year.

The Department is advised that international students and visitors to institutions from abroad should be treated in the same way as any individual travelling to Ireland and no exemptions can be considered. In that context, guidelines from the Department of Health (available [here](#)) should be followed in respect of international students and visitors travelling to Ireland which advises a 14 day period of self-isolation upon arrival into Ireland and a requirement to complete a COVID-19 Passenger Locator Form. Universities with halls of residence may be able to facilitate this self-isolation period for international students and visitors, however, this is a matter of the individual institution to decide as to whether this is feasible or not.

5. STUDENT ACCOMMODATION

The risk of virus transmission is particularly acute in settings where there is a high density and close proximity of individuals. In that context, student accommodation presents a potential risk and institutions will need to consider carefully how best to manage that risk. The Department is advised that institutions will need to consider their student accommodation facilities on an individual basis taking into account factors such as the design and layout of its student accommodation facilities as well as the number of students in order to mitigate the risk of virus transmission. Given the diversity of such accommodation, this will entail a case-by-case risk assessment. Consideration should be given to the management of shared spaces such as corridors, recreation areas as well as shared kitchens and bathrooms in halls of residence/dormitories. Consideration may be given to housing students from the same study programmes together.

Institutions with apartment style student facilities should consider the designation of residents in such accommodation as close contact groups. In that regard, students residing in an apartment are treated as a household and should one student contact the virus, then all residents of that apartment should restrict their movements in line with Department of Health advice. Institutions operating accommodation will need to develop or adapt protocols to manage outbreaks in these situations. A particular concern exists in relation to shared rooms as the risk of transmission is more significant in such a setting. Consideration may also be given to retaining vacant some units/apartments with en-suite bedrooms to enable relocation should an outbreak occur in accommodation with shared facilities.

Students travelling to and from the family home from their student accommodation during term time should do so in line with the public health advice in relation to national travel restrictions in place at the time.

6.HAND HYGIENE STATIONS

Hand-washing continues to feature prominently in the Protocol as well as in general public health advice from Government. Adequate functioning hand wash facilities will support this in institutions. In that context, institutions should consider the introduction of hand hygiene/sanitiser stations. The location of these should include campus building entry and exit points, high touchpoint areas and high footfall areas but must not lead to bottlenecks/congregations of staff and students undermining physical distancing of 2m. Where bottlenecks are likely (e.g. “teaching buildings” with multiple lecture halls), institutions could consider multiple stations within a building. As campuses reopen, institutions are advised to pay particular attention to such locations, use effective signage and respond quickly to prevent any activity that impedes distancing.

7.PEDESTRIAN TRAFFIC FLOW

Specific to further and higher education is the circumstance where there is mass movement through buildings and facilities on a regular basis and often on the hour. It is advised that institutions adopt pedestrian traffic flow patterns in order to facilitate physical distancing and that all such initiatives should be supported and promoted. Actions in this area could include -

- Staggering times of lectures, etc starting and finishing so not all students are moving at the same time
- Separate and clearly marked entrances and exits
- Deploying a one way traffic as far as feasible
- Separate traffic going up stairs and down stairs if possible
- Avoiding bottlenecks in foyers
- Considering tape or other floor markings of 2m at entrance and in foyers
- Multiple hand sanitisers at entrance/exit and/or other appropriate locations
- Good signposting

8. LECTURE/CLASS TIME LENGTH

There has been recent speculation concerning the risk of virus transmission for individuals occupying the same room, even with physical distancing being maintained, for more than two hours. Recent clarification on this issue advises that if an individual were to develop COVID-19, any person who has spent a cumulative period of more than two hours during a 24 hour period in an enclosed space with that person would be considered a close contact and would be required to self-isolate for 14 days. However, the focus here should be to minimise exposure as much as possible. Therefore, the need for face-to-face meetings for staff and students should be minimised. Similarly, where possible, teaching scenarios of less than 2 hours in duration and with appropriate physical distancing, are recommended. Where longer durations are necessary, teaching scenarios exceeding 2 hours may be permitted if institutions have assessed the risk attaching and have appropriate safeguards in place.

There is no requirement to limit the time spent on site per day or per week, however, staff and students should adhere to the public health guidelines in place while on site.

9. TEMPERATURE CHECKS

The Department is advised that temperature checking is ineffective and it does not form part of the public health advice in Ireland at this time. It also risks creating unnecessary bottlenecks or congregations of staff. Staff should be advised that they should not attend work if they have any symptoms of COVID-19 (common

symptoms include a fever, a cough of any kind, shortness of breath or loss or change in sense of taste or smell) or if they are self-isolating.

10. MONITORING

In the event that an individual learner/lecturer/staff member/front line worker is diagnosed with COVID-19 or if a cluster is identified within a further and higher education institution, responsibility for the on-site immediate management of an outbreak will be coordinated by local health authorities.

In the event that a cluster is identified within a student accommodation facility, direction and guidance from public health authorities will be issued to include identification of close contacts in conjunction with public health advice and requirements for self-isolation.

It is the Department's intention to engage with the health authorities in relation to specific scenarios which will be duly communicated to institutions.

11. CONTACT LOGS

At present, the education sector campuses are not permitted to reopen for students until Stage 4 of the Roadmap commences i.e. 20th July 2020. At present, there are no further actions envisaged insofar as education provision is concerned over and above what came into effect for Phase 1.

However, in terms of economic activity (i.e. "work"), Section 4 of the Roadmap sets out a number of considerations for a further phased return of workers subject to particular requirements and considerations and strictly in accordance with particular public health requirements. It is a matter for each institution to determine the cohort of staff which it deems essential or necessary to be on site whose phased return can be facilitated in accordance with these requirements e.g. researchers, cleaners etc.

In relation to the maintaining of contact logs, institutions should advise staff and students to ensure they keep records of instances where they have been in close contact with other individuals. This may be facilitated through the keeping of class attendees lists and timetabling information.

Staff and students attending face-to-face meetings should keep their own record of such meetings and the attendees so as to facilitate close contact tracing if necessary. From a further education and training perspective, instructors should keep a record also of the groups they have interacted with.

Managed entries are not considered feasible given the potential for creating congestion and the difficulty in ensuring a consistency of approach across a potentially large number of different buildings.

12. EMPLOYEES CONSIDERED AT HIGHER RISK AND/OR LIVING WITH INDIVIDUALS CONSIDERED AT HIGHER RISK

The “Return to work” policy of institutions should be amended to include reference to COVID-19. As advised in the protocol, a pre-return to work form should be completed by all staff. The pre-return to work form and any agreed individual plans arising may be useful in dealing with such cases.

The current public health advice is that there are two types of ‘at risk’ individuals—those that fall into the ‘very high risk’ group and those who fall into the ‘high risk’ group. There is different advice to protect people in each group. HSE guidelines in relation to people at higher risk of COVID-19 are available [here](#).

Staff who fall into the ‘very high risk’ group should follow the public health advice on cocooning while staff who fall into the ‘high risk’ group should work from home. If working from home is not possible, such staff must take extra care in the workplace to adhere to physical distancing requirements and hand hygiene.

For staff who live with individuals considered to be ‘very high risk’, upon their return to work, they should practice heightened vigilance with regard to hand washing, respiratory hygiene and use of personal protective equipment in order to minimize the possibility of infection. A risk based assessment should be carried out by an institution on a case-by-case basis and supplementary measures to minimise their risk of infection identified.

13. LEAD WORKER REPRESENTATIVES

The Protocol requires that each workplace should appoint at least one lead worker representative to work with the employer to prevent the spread of COVID-19 in the workplace.

Institutions are advised to refer to the Department of Public Expenditure and Reform Guidance and FAQs for Public Service Employers during COVID-19 (updated 15th June 2020) which clarifies the role of the lead worker representative.

The Guidance (which can be found [here](#)) also provides advice on the selection and appointment of lead worker representative(s) with reference to engagement between employers, employees and employee representatives as part of the process.

14. ISOLATION SPACES

The Protocol advises that employees presenting with symptoms of COVID-19 while at work should be isolated and that there is a requirement for the provision of a space to isolate in advance of leaving the premises.

From a further and higher education perspective, the number of isolation spaces to be provided will be dependent on the size of the campus and numbers of students. Isolation spaces should be provided at campus level as a minimum and are also recommended in multi-use buildings on larger campuses (e.g. large building housing multiple departments/ faculties etc). An isolation space is not necessarily required in every department/unit. It is considered that generally one isolation space in a large building will suffice depending on the scale and occupancy levels of a building but a contingency plan must be in place to address a scenario of multiple individuals displaying symptoms at the same time.

15. CLEANING

The Protocol refers to the requirement for cleaning products to be used in respect of shared equipment e.g. PCs, printers etc as well as the implementation of cleaning regimes in places of employment.

New protocols will be required for campus and classroom cleaning services which will include twice daily cleaning of contact/touch surfaces such as table tops, work equipment, door handles and handrails implement thorough and regular cleaning of frequently touched surfaces. Institutions may facilitate cleaning services by minimizing the changeover of students where possible and the management of timetables to reduce movement by staff and students between teaching areas.

Shared equipment (e.g. computers, printers etc), by the nature of their use, would benefit from additional cleaning and institutions may consider requesting users to clean such equipment before and after each use.

There is a very useful guidance document produced by the European Centre for Disease Prevention and Control (ECDC) available [here](#) which provides guidance on environmental cleaning in healthcare and non-healthcare settings during the COVID-19 pandemic.

16. FIRST AID / FIRE MARSHALLS

In relation to the designation of additional First Aiders and/or Fire Marshalls, institutions should be cognisant of their requirement to comply with existing Health and Safety regulations. First Aiders with a specific role in acting as first responders should be provided with updated training on infection prevention and control principles including performance of hand hygiene and appropriate use of personal protective equipment when delivering first aid.

Further advice on first aid from the Pre Hospital Emergency Care Council (PHECC) is available [here](#).