UCU position on relaxation of national restrictions and prison education

19 July 2021

The Westminster Government has published its **workplace guidance** just two working days before national restrictions relaxed in England which has left insufficient time for UCU reps and employers to meaningfully consult on risk assessments.

Employers have significant duties under health and safety legislation to ensure workplaces are safe for all which includes reducing covid transmission risks to the lowest level practicable. As we now find ourselves in a third wave of the pandemic in the UK, with infection rates rising exponentially, increasing hospitalisations and just 52% of population fully vaccinated, we are clear that robust infection control measures are essential.[i]

UCU is also deeply concerned from information via POA that there has been a 300% increase in self-isolation and outbreak sites over the last 10 days. As infections rates continue to rise exponentially, employers must ensure strict adherence to risk assessment control measures and have contingency plans in place to ensure safe staffing levels and safe operation of prisons and education.

Prisons are higher risk environments due to the high numbers of people living and working together in indoor spaces which makes the transmission and outbreak risks extremely high. Employers must ensure robust controls are in place to prevent transmission, to prevent further disruptions to education and to protect the health of staff and students.

UCU expect the following mitigations to remain in place following the relaxation of restrictions 19 July (England) and 9 August (Scotland):

Ventilation[ii]

Risk assessments need to ensure each space to be utilised is well ventilated with clarity on maximum occupation levels to reduce airborne transmission risks. Close monitoring of ventilation to ensure a good supply of fresh air into a space is essential. This can also be maintained through considered use of C02 monitors.

Health & Safety reps are asked to note and review the Chartered Institution of Building Services Engineers (CIBSE), revised guidance documents as part of their Emerging from

Lockdown Series[iii]. V5 of the ventilation guidance has been accompanied by a new document "*COVID-19: Air cleaning technologies*". Specifically, sections 4.2-4.5 reference to fixed and portable HVAC (HEPA / UV-C) air filtration units which safety reps should request to improve ventilation in specific areas. You should also note the **COVID-19: Relative Exposure Index Calculator** which provides a method for assessing the risk of airborne transmission of SARS-CoV-2.

Face masks and face coverings[iv]

Face coverings should continue to be worn by all those able to do so when in indoor spaces. In addition, we want to see better provision of high quality face masks at a minimum FFP2 standard as this offers better protection to individuals from airborne transmission.

We are receiving reports that HMPPS are suggesting at some sites that learners in bubbles do not have to wear masks, including in attendance at education. Members need to ask to see the Safe Operating and Local Operating procedures (as set out in the checklist below). For example, an outbreak site would mandate the wearing of masks, whereas an open prison that isn't an outbreak may decide to only mandate masks at pressure points where prisoners are in close proximity at gates or queues. The approach to learners wearing masks should therefore be based upon risks. If learners are in poorly ventilated classrooms the risks are obviously higher and our members and reps should continue to push for improved controls in these circumstances.

Social distancing[v]

Social distancing can reduce close contact transmission and also support better ventilation and reduction in airborne transmission by limiting occupancy rates in indoor spaces. Social distancing should be seen as a positive measure which would help prevent a number of different transmission routes (close contact and droplet transmission, airborne transmission, and fomite transmission). Not all activities will need to take place 'in person' and the past year has shown it is possible to deliver lectures, tutorials and student support virtually.

Cleaning and hygiene[vi]

Enhanced and effective cleaning and hygiene measures must remain in place. Employers need to ensure cleaning is undertaken by staff who are well trained and equipped to undertake regular cleaning duties. Risk assessments for usage of all cleaning materials needs to be undertaken for cleaning staff and others who may come into contact with cleaning materials, sprays and sanitisers. Employers must provide appropriate levels of information, instruction and training to ensure safe usage and storage.

Disproportionate impact[vii]

Covid has not impacted on everyone equally, and employers must consider the equality impact of any relaxation in controls on those at increased risk of contracting covid and those who could have severe and long term health outcomes. There are a number of unknowns about the risk factors for long covid and this must be considered in workplace risk assessments to protect people from the short and long term impact of covid infection. Individual risk assessments must also be undertaken to ensure individual risk factors are identified and appropriate measures put in place to protect people from harm.

Testing and self isolation[viii]

PCR testing and LFD testing should continue for those people who are symptomatic or asymptomatic. However workplace risk assessments need to identify the limits of testing as a control measure given the low uptake of testing and the lack of support available to those self-isolating.

Homeworking

We recognise that home working continues to be an important measure to reduce social mixing and transmission. The sector has demonstrated over the past year that it is possible to work from home where necessary and homeworking needs to be part of employer's contingency plans to prevent outbreaks and further disruptions to education.

Update risk assessments, safe systems of work, safe operating procedures

Members and reps checklist:

✓ Ask for the updated Prison Local Operating and Safe Operating Procedures (LOP/SOP).
✓ Ask whether prisons are outbreak sites and what recovery regime phase they are in.
✓ Ask about current and predicted staffing levels and any contingency plans (for safe operation of prisons and education delivery).
✓ Ask for specific risk assessments for education workspaces (e.g. classroom delivery, workshops, wings).
✓ Ask for updates to individual risk assessments for all those who may be at increased risk from covid infection.
✓ Ensure all transmission risks are identified in risk assessments and safe systems of work for each education activity.

Our prison specific hazards and controls checklist is here: **Covid-19 hazards and controls: considerations for ongoing review of risk assessments in prison education (ucu.org.uk)**

Further and more detailed guidance from UCU will be provided to members and branch representatives over the coming weeks.

i **https://www.theguardian.com/commentisfree/2021/jul/13/covid-numbers-england-freedom-day-dont-add-up-strain-nhs**

ii **https://www.hse.gov.uk/coronavirus/equipment-and-machinery/air-conditioning-and-ventilation/identifying-poorly-ventilated-areas.htm**

https://www.gov.uk/government/publications/emg-and-spi-b-application-of-co2-monitoring-as-an-approach-to-managing-ventilation-to-mitigate-sars-cov-2-transmission-27-may-2021

iii **https://www.cibse.org/emerging-from-lockdown#5**

iv **https://www.bsigroup.com/globalassets/localfiles/en-gb/product-certification/personal-safety/bsi-guide-for-personal-safety-equipment-0520.pdf**

https://www.cdc.gov/mmwr/volumes/70/wr/mm7021e1.htm

v **https://www.independentsage.org/wp-content/uploads/2020/07/2m-vs-1m-guidance-Independent-SAGE-statement-June-21.pdf**

vi **https://www.hse.gov.uk/coronavirus/cleaning/index.htm**

vii **https://www.independentsage.org/wp-content/uploads/2020/11/Inequalities-_i_SAGE_FINAL-draft_corrected.pdf**

https://www.tuc.org.uk/news/tuc-calls-long-covid-be-urgently-recognised-disability-prevent-massive-discrimination

viii **https://www.independentsage.org/wp-content/uploads/2021/06/Supprt-document-final.pdf**