

The London Interdisciplinary School COVID-19 policy

1. Introduction

1.1 Purpose of this policy

- 1.1.1 This policy outlines the arrangements adopted by LIS with the objective of making our facilities and provision available with minimal disruption and whilst also minimising the risks presented by the COVID-19 pandemic.
- 1.1.2 The requirements are principally informed by [advice and guidance from UK government](#), the [COVID-19 Secure Guidance](#), and the Health and Safety [Executive \(HSE\)](#).
- 1.1.3 The purpose of this policy is to enable LIS to operate effectively by allowing staff, students, contractors and authorised visitors to undertake their responsibilities and activities without detriment to their health, safety and wellbeing.
- 1.1.4 The policy focuses on practical aspects of life on the premises. Naturally, different members of the LIS community will face individual needs. In this context, line managers will work closely with staff to consider the individual support needs of the LIS team, and staff will work closely with students, through existing channels of student support and engagement, to support students' individual needs.

1.2 Scope of this policy

- 1.2.1 The policy applies to staff, students and visitors who are authorised access/work/study on the premises. This includes contractors.
- 1.2.2 The policy applies to all LIS premises.
- 1.2.3 This policy will be reviewed regularly with the objective of applying it to all aspects of life at LIS including all educational, managerial, commercial and recreational activities.

1.3 Definitions

- 1.3.1 Social distancing
Social distancing is a set of non-pharmaceutical interventions or measures intended to prevent the spread of a contagious disease by maintaining a physical distance between people and reducing the number of times people come into close contact with each other.
- 1.3.2 Roadmap out of lockdown
From 8th March 2021, people in England will see restrictions start to lift and the [Governments four step roadmap](#) offers a route to a more normal working and studying life.
- 1.3.3 Personal protective equipment (PPE)
In the UK, the [Personal Protective Equipment at Work Regulations 1992](#) (as amended) apply to the use of PPE, additional regulations apply to the use of respiratory protective equipment (RPE). PPE protects the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high visibility clothing, safety footwear and safety harnesses. It also includes RPE, such as face masks. A face mask can include a surgical type mask or close fitting RPE designated at FFP3 or equivalent.

1.3.4 Face coverings

In the context of the coronavirus (COVID-19) outbreak, a face covering is something which safely covers the nose and mouth. They can be reusable or single use. This includes the use of a scarf, bandana, religious garment or hand-made cloth covering but these must securely fit round the side of the face. Face coverings are not classified as PPE because rather than protecting the user, they are intended to protect others.

2. Policy

2.1 Principles

2.1.1 Compliance with the requirements of this policy will ensure:

- LIS meets its obligations in respect of legislation and government guidance.
- The health protection of staff and students, whilst on LIS premises.
- The health protection of staff and students whilst undertaking LIS-related activities offsite, including overseas.
- The health protection of contractors authorised to work on our premises.
- The health protection of visitors authorised to access or work on our premises.
- Everyone is aware of their roles and responsibilities.
- That staff, students, and visitors are appropriately informed, instructed and where necessary trained.

2.1.2 In order to meet these objectives, LIS will:

- Clearly define the organisational arrangements for achieving compliance (see roles and responsibilities section of this Policy).
- Implement current UK Government guidance, translating its requirements into specific actions in relation to life at LIS. When considering how to apply this guidance, LIS will take into account staff, students and visitors as well as other persons who may be affected by LIS activities.
- Continue to comply with existing legal obligations relating to health and safety, employment and equality.
- In line with LIS's [risk management policy](#), ensure that the risks associated with Covid-19 are assessed and managed through processes of risk assessment and that risk controls are implemented to protect staff and others. It is recognised that the risk of Covid-19 cannot be eliminated and, as such, LIS will assess these risks and do everything reasonably practicable to minimise them.
- As part of the risk assessment process, have regard to whether the staff, students or service users are especially vulnerable to Covid-19.
- Consider the assessment of individual health needs through the provision of existing anticipatory procedures for participation and support.
- Use current Government guidance to inform decisions and control measures, including the specific circumstances under which personal protective equipment or face coverings are to be worn. Where anyone chooses to wear a face covering or,

where mandatory, has a legitimate reason not to wear one, LIS will not accept behaviour by others which dissuades or judges a person for making this choice or justifiable decision.

- Produce and, where necessary, implement an operational plan which sets out the arrangements for preventing and/or containing an outbreak of the virus and minimising its impact.
- Ensure that the required actions and behaviours of staff, students, contractors, visitors, and other service users are communicated effectively, including the provision of information, instruction and training (including the provision of signage) for the management of risks.
- Consult with health and safety representatives from the recognised trade unions and staff on the management of risks.
- Engender a culture of question and challenge, where staff, students and others are encouraged to raise concerns or report problems in relation to their health, safety and wellbeing.
- Consider disciplinary action (in line with LIS's disciplinary procedures) for any person who breaches the requirements of this Policy, associated procedures and regulations, or endangers them self or others.
- Continually review its risk management arrangements to ensure they remain effective, and in accordance with any updates in legislation and Government guidance.

2.2 Procedures

2.2.1 Risk assessment

In accordance with Government guidance, as part of the process of operating premises and services, LIS will use [risk assessments](#) to inform its decisions and control measures. Such an approach will be integrated into every aspect of LIS business. These risk assessments will establish the measures necessary, including social distancing, other mitigating actions, the circumstances under which PPE is required, and any other precautions necessary to manage the risk.

2.2.2 Induction

All new students and staff will be expected to complete an induction to ensure they are fully aware of the implications of COVID-19 for life at LIS.

2.2.2 Social distancing

LIS will ensure that its activities are managed in accordance with the measures/restrictions required by the Government's roadmap out of lockdown. Such requirements will apply to all LIS premises, on-site activities, as well as whilst undertaking University-related activities off-site.

From 17 May 2021, Government guidance states that most legal restrictions on meeting others outdoors are lifted, although gatherings of over 30 people remain illegal. Indoor gatherings are limited to 6 people or 2 households. To ensure that this lessening of

restrictions continues to mitigate the risk of Covid-19 transmission within our community, the LIS will apply the above requirements as follows:

- Students and staff can meet socially indoors, provided:
 - The total number of people does not exceed six.
 - Where members of 2 households gather, the total number of people does not exceed six.
 - They stay 2 metres apart from anyone who is not in their household or support bubble where possible, or 1 metre with extra precautions in place (such as wearing face coverings) if they cannot stay 2 metres apart.
- If gatherings of up to 30 people are part of an organised event, staff are required to conduct a risk assessment.

There are actions everyone at LIS can take to minimise the transmission of COVID-19 under these current restrictions, and staff and students are advised to:

- Meet outside rather than indoors, if possible.
- If meeting inside, ensure the space is well ventilated (i.e. open windows and doors).
- Minimise the number people they're in close contact with, and the duration of close contact.
- Participate in twice weekly testing to identify asymptomatic positive cases quickly and ensure self-isolation to break the chain of transmission.
- Continue to practice effective respiratory and hand hygiene procedures, frequently washing hands for 20 seconds or more and/or using hand sanitizer.

In all instances, and in line with [LIS's Business continuity plan](#), any exceptions to these rules/restrictions will be subject to a risk assessment and prior authorisation by Silver Command.

Exemptions include where the gathering limit is for:

- Work purposes.
- The provision of voluntary or charitable services.
- The purposes of education or training (i.e. teaching, study spaces).

In accordance with its legal obligations, and UK Government guidance, LIS will also take action to maintain the advised social distancing wherever possible. Where the social distancing guidelines cannot be followed in full in relation to its premises and activities, LIS establish (through the process of risk assessment) whether that activity can be redesigned, or the environment reconfigured to maintain a 2m distance or 1m with risk mitigations (where 2m is not viable).

Mitigating actions that the University may implement include measures such as:

- Keeping the activity time as short as possible.
- Using screens and barriers to separate people from each other.
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.
- Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others).
- Promoting frequent hand washing and surface cleaning.

- Any other action identified to be necessary, including in response to updates in Government guidance.

Where such measures are adopted, consideration will be given to the impact on people with hearing impairments and other long-term health needs/disabilities, and how they can be supported. To assist with the risk assessment process, LIS will apply the existing [Government guidance](#) which identifies the steps that will usually be needed to maintain social distancing in a range of different working environments/workplace activities, as well as those specifically relating to the [Higher Education sector](#).

LIS recognises that through the risk assessment process it may not always be possible to keep the stated social distancing requirement in respect of its premises and activities. Where social distancing guidelines cannot be followed in full, even through redesigning a particular activity, LIS will consider whether that activity needs to continue, and:

- If not, discontinue the activity.
- If so, take all the mitigating actions possible to reduce the risk of transmission, and before continuing with the activity.

2.2.3 COVID-19 testing

LIS recognises that Covid-19 testing plays a key role in mitigating the transmission of the virus, including the early identification and isolation of members of its community who are asymptomatic and may be unintentionally spreading the virus. As such, it will:

- Facilitate and support the NHS Covid-19 testing of all staff and students who are experiencing symptoms (however mild) including;
- Co-operate with any request from Government to participate in the mass asymptomatic testing of members of its community, including the provision of home test kits;
- Conduct additional asymptomatic testing, where risk assessment or advice and guidance from Government identifies this to be necessary.

Staff and students arriving from overseas will have to comply with the procedures for international arrivals outlined by the UK Government.

2.2.4 Personal Protective Equipment (PPE)

LIS recognises the UK Government's advice and guidance in relation to the use of PPE and that it advocates the use of alternative more effective control measures. It also acknowledges that PPE is in limited supply and that supply is prioritised for the NHS and other front-line higher risk services. It also accepts that it is a challenge to wear PPE for prolonged periods of time and maintain effective hygiene controls.

Where personnel are already using PPE/RPE in their work activity to protect against non-COVID19 risks, LIS will continue to comply with its existing legal obligations by providing such equipment in accordance with the Personal Protective Equipment at Work Regulations 1992 (as amended), and other relevant regulations and guidance.

For Covid-19 risks, the University will provide PPE/RPE where the risk assessment identifies it to be necessary and, only, if it is needed after implementing other measures/controls. Such PPE/RPE will be subject to the requirements of relevant regulations, face fit testing and training requirements. Examples of where LIS has currently assessed PPE/RPE as necessary include:

- First aid responders assisting an individual who is symptomatic and may have COVID-19.
- Cleaning workplaces following illness or first aid incidents where there may be contact with body fluids.

2.2.5 Face coverings

LIS recognises the UK Government regulations on the wearing and advice/guidance on the safe use of face coverings. There is evidence to suggest that, when used correctly, face coverings may reduce the likelihood of someone with the infection passing it on to others, particularly if they are asymptomatic. At LIS, the wearing of a face covering is required:

- In all settings mandated by [English law](#), and where relevant to higher education activities/premises.
- In all settings mandated by the relevant laws of other countries (including Northern Ireland, Scotland, Wales), when travelling on LIS business.
- Where a risk assessment identifies wearing as a precautionary measure, and only after other more effective measures have been considered.
- In all shared indoor LIS spaces, including whilst moving through buildings and within teaching, learning and study environments.
- When moving around premises.
- In the event of an emergency evacuation, when individuals will be required to wear a face covering (if one can be donned without risking personal safety) as well as maintain social distancing at the assembly point and on re-entering the building.

The wearing of a face covering is also strongly advised:

- When living with a person confirmed as positive or with active symptoms, to further reduce transmission in the home environment.
- From 17 May 2021, for permitted social gatherings inside, where 2 metres apart from anyone who is not in your household or support bubble cannot be achieved.

In some exceptional circumstances a face covering will not be required to be worn. This includes:

- Not being able to put on, wear or remove a face covering because of a physical or mental illness or impairment, or disability, or without severe distress.
- If you are providing assistance to someone who relies on lip reading to communicate.
- Within a single occupancy office.
 - Within a meeting where there is a need to meet face-to-face and attendees can be seated at a distance of at least 2 metres from each other. Where seated at a distance of at least 2 metres cannot be achieved, the wearing of a face covering will be required, and windows kept open to increase ventilation.

- If giving a lecture, leading a seminar or a teaching session and when the wearing of a face covering would impede communication.
- Within a catering establishment when using table service or in other LIS spaces when reasonably necessary to eat or drink. At all other times (i.e. when not seated for eating or drinking) a face covering must be worn.
- When undertaking sporting or fitness activities where a risk assessment has taken place and other mitigating measures are identified and implemented.
- When undertaking a formal LIS activity which has been risk assessed and identified as not being conducive for the wearing of a face covering (e.g. dancing/singing as part of a programme of study/research).
- Instances for safety and security reasons that necessitate an individual to remove a face covering for identification purposes. Such request should be undertaken in a well-ventilated location, ensure good hygiene practices, and maintain adequate social distancing.

LIS considers that responsibility for wearing a face covering sits with individuals and, as such, will take reasonable steps to promote compliance with the law and LIS requirements through the provision of signage and other means of communication.

For further guidance on face coverings, refer to the [UK Government guidance](#), which all staff and students should be aware of, including how to wear a face covering, further details on when you do not need to wear a face covering, and making your own face covering.

2.2.6 Teaching and learning

All teaching and learning spaces will be risk assessed to ensure they meet government guidelines. In addition, LIS will produce and keep under review:

- A Central Teaching Spaces Risk Assessment
- Operational protocols for teaching on campus
- A Teaching Room Matrix, which identifies the new room capacities and the Covid-secure measures which have been implemented in each room.

2.3 Roles and responsibilities

2.3.1 In line with LIS's [Business continuity plan](#), Gold Command will approve this policy, including any future revisions.

2.3.2 Silver command will monitor the continued effectiveness of this Policy and review its requirements in response to the recovery and phased return for staff and students, the periodic updating of Government guidance, and whenever there is a significant change or reason to believe it is no longer valid.

2.3.3 Members of staff and students

In addition to the responsibility to take care of their own health and safety and take due consideration for the health and safety of others, LIS requires members of staff and students to:

- Not come onto premises if they or anyone they are living with has symptoms of Covid-19, notifying LIS immediately.
- They must then:
 - Arrange for a test as soon as possible and stay at home and wait for the results.
 - Where the results are positive for Covid-19, self-isolate in accordance with current [Government guidelines](#) and notify LIS.
 - Only return to campus/work/study when the required self-isolation period has expired, the resultant fever has subsided, and they feel recovered enough.
 - Where the results are negative, return to campus/work/study when they feel well enough.
 - If you're told by either the NHS Test and Trace service or LIS that you've been in contact with a person who has coronavirus (Covid-19), stay at home for the required self-isolation period. An instruction from the NHS service will take precedence over any advice given by LIS.
 - Co-operate with LIS in respect of any information requested to assist [Public Health England \(PHE\)](#) with contact tracing and comply with any subsequent advice to self-isolate.

If, whilst at work or on LIS premises, they start to experience Covid-like symptoms, feel unwell due to unexpected symptoms, or return a positive COVID test, they should leave the premises and notify LIS.

Responsibilities for notifying LIS of COVID symptoms or a positive COVID test result are as follows.

- Staff should formally notify their line manager (who will subsequently notify the designated HR lead)
- Students should formally notify the Head of Student Support.

The designated HR lead and the Head of Student Support will be responsible for working together to keep a live record of suspected and actual COVID cases. With use of this record, the designated HR lead and Head of Student Support will be responsible for contact tracing in relation to reported cases, including communication with members of the LIS community who are deemed to have been in contact with individuals suspected to have COVID-19.

On the basis of the live record of COVID-19 cases, the Head of Student Support and the designated HR lead will remain in regular contact with Gold Command about the implications of the latest figures. As appropriate, Gold Command will convene to consider changing risk assessments and mitigations, including the possible partial or full closure of the physical premises and the associated implications for teaching and learning activity.

LIS also requires members of staff and students to:

- Comply with the Regulations in respect of the Road map out of lockdown.
- Assist with reducing transmission by co-operating with any reasonable request to undertake a Covid-19 test. Staff and students may be asked to provide evidence of testing.
- At all times, and in accordance with UK government guidelines, continue to maintain social distancing with anyone they do not live with.
- Ensure they continue to practice effective respiratory and hand hygiene procedures, frequently washing their hands for 20 seconds or more and/or using hand sanitizers.
- Whilst on LIS premises and/or undertaking work activities, adhere to the findings of any risk assessment, and the requirements of any information, instruction and training (including induction and signage) provided.
- Wear PPE/RPE in accordance with instruction and training.
- Adhere to any regulations or requirements for the wearing of face coverings and follow any advice and guidance on safe use and hygiene protocols. It is recognised that the responsibility for wearing a face covering sits with individuals.
- Bring without delay to the attention of their line manager or person responsible for the area or activity, any identified hazards, concerns or necessary improvements.
- Not intentionally or recklessly interfere, misuse or remove anything provided in the interests of health, safety and well-being (e.g. sanitizing equipment or signage).

Note: The above requirements are in addition to staff and students complying with other LIS policies and standards, and relevant arrangements for the area or activity. Failure to comply with the above requirements may be regarded as a breach of English Law and/or LIS Regulations and may result in disciplinary action.

2.3.4 Visitors and contractors

All visitors to the University are required to follow any health and safety instructions given to them.

2.3.5 Supporting behaviours

While individuals may have differing views as to the adequacy of current UK Government guidelines or the effectiveness of our response to these requirements, this is a situation in which the actions of one may affect the health, safety or wellbeing of another and, therefore, there will be an obligation to comply with LIS's agreed requirements and guidelines.

The primary objective of any enforcement action will be to protect members of our community, including those we interact with as part of every aspect of our business. The secondary aim will be to change behaviour and to prevent re-occurrence.

Staff and students will be encouraged to work as a supportive community, and will not be expected to routinely report on, observe others, or police behaviour. The LIS community will be signposted to report concerns directly to the Chief Executive, Edward Fidoe (Ed@t-lis.org) who will be the handler and receiver of these submissions. Any reporting of this type is treated with the strictest confidence. This may initiate a change in planning, signage for

that area, or other appropriate response. In cases of behaviours that are of significant concern, staff and students should contact premises Security.

In the cases of individual non-compliance, education will be the initial response, undertaken by the line manager or the personal tutor or programme leader. Those who contravene the requirements and/or guidelines on a serial or serious basis will be managed through the existing [Disciplinary](#) Procedures, taking into consideration the secondary aim of preventing re-occurrence. This may mean more apparent serious sanctions such as restriction of access to LIS facilities are undertaken over sanctions such as warnings or fines.

3. Governance requirements

3.1 Implementation and communication plan

3.1.1 The policy is communicated to all staff and students as part of the [Coronavirus advice webpage](#). It is also communicated through specific, relevant training, including inductions and specific training sessions for staff and visitors. The Learning Resources and Property Working Group will be notified and information disseminated through line management.

During term time, the LIS coronavirus advice webpage will also include a summary of the latest UK Government guidance and LIS approach, as described in this document.

3.2 Exceptions to this policy

There are no exceptions to this policy.

3.3 Review and update

3.3.1 In view of the periodic updating of Government guidance, this policy will be regularly reviewed to ensure it takes account of these changing circumstances.

3.3.2 This is an evolving document and the impact of different groups of people particularly in relation to equality impact will be continually monitored, and adjustment and support provided as circumstances change/develop. This will include a review if the Equality Impact Assessment.

3.3.3 All changes will be reviewed and agreed by Silver Command Group and approved by Gold command.

3.4 Legislative context

3.4.1 The requirements of:

- [The Health and Safety at Work etc. Act 1974](#) and associated subordinate legislation
- [The Equality Act 2010](#)
- [The Coronavirus Act 2020](#)
- [The Health Protection \(Coronavirus, Restrictions\) \(Steps\) \(England\) Regulations 2021](#)

- [The Health Protection \(Coronavirus, Restrictions\) \(No.2\) \(England\) Regulations 2020 \(as amended\)](#)
- [The Health Protection \(Coronavirus, Restrictions\) \(All Tiers\) \(England\) Regulations 2020](#)
- [The Health Protection \(Coronavirus, Wearing of Face Coverings in a relevant place\) \(England\) Regulations 2020](#)
- [Health Protection \(Coronavirus, Wearing of Face Coverings on Public Transport\) \(England\) Regulations 2020 \(as amended\)](#)
- [Health Protection \(Coronavirus, Restrictions\) \(Obligations of Hospitality Undertakings\) \(England\) Regulations 2020.](#)

3.4.2 Policy legal statement

This policy sets out to comply with the required ‘duty of care’ placed upon LIS. Under Health and Safety Law a ‘duty of care’ is generated between organisations and individuals when carrying out activities that could foreseeably cause harm. The primary duty of care is owed through the employer-employee relationship in which the employer owes a duty of care to ensure that work activities that could result in harm to the employee are assessed and controlled. That duty of care is put into practice by the line management responsibilities as set out in the hierarchy of the organisation. This duty of care cannot be delegated away; instead the act of delegation must be accompanied by a realistic and workable system of monitoring or supervision to ensure that the delegated task has been adequately implemented (i.e. the responsibility is not met by giving directions; it is met when those directions have been confirmed as carried out). The result is a cascade of delegated accountability that runs through the organisation via the line management network, accompanied by a system of monitoring, supervision and feedback. The duty of care extends to assurance that services provided by others (be they another department of LIS or contractors) are undertaken safely.

The level of assurance required should be commensurate with the risk of the activity. In addition, anyone carrying out an activity owes a duty of care to anyone who may be put at risk by the activity, such as students, staff and visitors

3.4.3 Other references

[Our plan to rebuild: the UK Government’s COVID-19 recovery strategy](#)
[Higher Education: re-opening buildings and campus safely](#)
[Health and Safety Executive guidance on working safely during the coronavirus outbreak](#)
[Higher education coronavirus \(COVID-19\) operational guidance](#)

3.5 Stakeholder statements

3.5.1 Equality

Consideration is given to the protected characteristics of all people groups identified in [The Equality Act 2010](#)

. The protected characteristics include: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

LIS has legal obligations to ensure it has due regard to equality in implementing measures under this Policy, and that this Policy does not unlawfully discriminate against groups who share a protected characteristic. This Policy and all other associated health and safety related policies take this into account.

3.5.2 Health and safety

This policy forms part of the overarching statement on health and safety for LIS, and should be read in conjunction with the School's [Health and Safety Policy](#).

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Related documents:

(e.g. associated forms, underpinning processes, related policies or overarching policies)

Risk Management Policy

Health and Safety Policy

Student Disciplinary Procedure

Staff Disciplinary Procedure