

DIOCESAN COLLEGE ("BISHOPS") COVID-19 MANAGEMENT POLICY

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A. <u>CHAPTER 1 - OVERVIEW</u>

1. BACKGROUND TO THE POLICY

- 1.1. The COVID-19 Coronavirus ("COVID-19") has had a significant impact on Diocesan College ("the School"), none more so than the national lockdown aimed at preventing the transmission of the virus, which initially saw the closure of schools and only limited economic activity related to the provision of essential services and that which could be performed remotely being permitted.
- 1.2. Undoubtedly COVID-19 has ushered in a new way of working and this will be a period of change where many of the safety protocols the School puts in place may well become permanent with a new way of working.
- 1.3. As restrictions on schooling and economic activity are lifted, it is necessary to implement measures aimed at ensuring a safe and healthy working environment and the restoration of education at the School in line with the relevant legislation, regulations and directives.

2. APPLICATION OF THE POLICY

This Policy applies to everyone that is associated with the School, i.e. employees, pupils, contractors, suppliers, visitors and any other persons.

3. HEALTH AND SAFETY POLICY STATEMENT

The School is committed to providing and maintaining, as far as reasonably practicable, an environment that is safe and without risk to the health and safety of its employees and pupils. The responsibility for health and safety in the School is a shared responsibility between the School, its employees, the pupils and their parents/guardians. This Covid-19 Management Policy aims to establish Bishops' standards and procedures concerning health and safety at the School, insofar as it relates to COVID-19.

4. **AMENDMENTS**

This Policy is a working document. It may be amended by the School from time to time as the science regarding COVID-19 develops and guidance is published regarding how the transmission of the virus can be prevented. It is furthermore subject to amendment as the government issues new and/or amended regulations.

B. CHAPTER 2 - UNDERSTANDING COVID-19

1. WHAT IS COVID-19?

Coronaviruses are a large family of viruses which may cause illness in animals and/or humans. In humans, several coronaviruses are known to cause respiratory infections ranging from the common cold to more severe diseases such as Middle East Respiratory Syndrome (MERS) and Severe Acute Respiratory Syndrome (SARS). COVID-19 is the cause of the current pandemic.

2. THE PRIMARY SYMPTOMS OF COVID-19

- 2.1 COVID-19 is a pneumonia-like infection with symptoms ranging from mild to severe and manifesting as respiratory illness, fever, coughing, shortness of breath, sore throat or fatigue. In more severe cases, the infection can cause pneumonia, severe acute respiratory syndrome, kidney failure and, in extremely severe cases, death.
- 2.2 The symptoms may appear in as few as 2 days or as long as 14 days after exposure.
- 2.3 The vast majority of people who contract COVID-19 will suffer only mild symptoms. However, early indications are that the elderly and people with pre-existing medical conditions ("comorbidities") such as hypertension, diabetes, cardiovascular disease and respiratory system disease, are more at risk of experiencing severe symptoms.

3. TRANSMISSION OF COVID-19

- 3.1 According to the World Health Organisation ("the WHO"), the initial cases of COVID-19 probably involved exposure to an animal source, but the virus is now spreading from person-to-person.
- 3.2 The spread of the disease is thought to happen mainly *via* respiratory droplets produced when an infected person coughs or sneezes, similar to how influenza and other respiratory pathogens spread.
- 3.3. It is not certain how long the virus that causes COVID-19 survives on surfaces, but it seems to behave like other coronaviruses. Studies suggest that coronaviruses (including preliminary information on the COVID-19 virus) may persist on surfaces for a few hours or up to several days (research suggests that it may be between three hours and three days). This may vary under different conditions (e.g. type of surface, temperature or humidity of the environment).

4. TREATMENT OF COVID-19

- 4.1 The WHO states that, currently the treatment is supportive (providing oxygen for patients with shortness of breath or treating a fever, for example). To date, there is no specific antiviral treatment available. Antibiotics do not treat viral infections; however, antibiotics may be required if a bacterial secondary infection develops.
- 4.2 If left untreated or not treated correctly, infection can lead to pneumonia, severe acute respiratory syndrome, kidney failure and, in the worst case, death.

C. CHAPTER 3 - RELEVANT LEGISLATION

1. DISASTER MANAGEMENT ACT NO. 57 OF 2002

- 1.1. The COVID-19 pandemic has been declared a national disaster under the Disaster Management Act, No. 57 of 2002.
- 1.2. A national disaster, in the context of the COVID-19 pandemic, is an occurrence which causes or threatens to cause death, injury or disease or disruption of the life of a community, the magnitude of which exceeds the ability of those affected to cope using their own resources.
- 1.3. The National Command Council manages the disaster by the issuing of regulations and directives designed to assist and protect the public; provide relief to the public; protect property; prevent or combat disruption; or deal with the destructive and other effects of the disaster.
- 1.4. A number of regulations and directives have been issued by the government, including those relating to the national lockdown and the return to economic activity.

2. THE RISK ADJUSTED STRATEGY

- 2.1. The regulations on a risk adjusted strategy provide a framework for the return of sectors of the economy back to work.
- 2.2. Five alert levels are provided for, graded from one to five with Alert Level 5 imposing the most restrictions and Alert Level 1 the least. Various sectors of the economy return to activity at different stages subject to certain restrictions and measures being implemented. Certain sectors of the economy will only return to economic activity at Alert Level 1.
- 2.3. A national, provincial, district and metro alert level is provided for so as to target areas at risk and to free up economic activity in areas which are not at risk. A return to higher alert levels, should circumstances require more stringent restrictions, may be implemented.
- 2.4. Initially the return to economic activity will be based on the national alert level, but will progressively be expanded to provincial, district and metro levels allowing the return to economic activity to be adapted to the level of infection and healthcare readiness in the local area.
- 2.5. As a general rule the five alert levels require that:
 - 2.5.1. all COVID-19 health and safety protocols be followed at all times, including observance of guidelines for social distancing, sanitation and hygiene, and the use of appropriate personal protective equipment, like cloth face masks, as determined by the National Department of Health;
 - 2.5.2. people may travel to perform and acquire services only where such services cannot be provided from the safety of one's home;

- 2.5.3. the permitted level of employment must take into account the necessary social distancing guidelines as per the National Department of Health; and
- 2.5.4. every business is required to adhere to detailed health and safety protocols to protect their employees and put protocols in place to enable disease surveillance and prevent the spread of infection.
- 2.6. There is an easing of restrictions and particular requirements as the level of alertness is lowered. In addition, the relevant ministers, including sector ministers, may impose specific requirements or restrictions. These are in addition to the normal obligations of employers in terms of the Occupational Health and Safety Act, No. 85 of 1993.
- 2.7. In addition to that which has been set out above, schools must implement measures to ensure the safety of their pupils. All schools that are permitted to resume operations will be required to do so in a phased manner, first preparing the School for a return to operations, followed by the return of the workforce, whilst maintaining minimum levels of employees and finally returning the pupils to the School.

3. OCCUPATIONAL HEALTH AND SAFETY ACT 85 OF 1993 ("the OHSA")

- 3.1. Duties of the employer:
 - 3.1.1. Section 8 of the OHSA imposes a statutory duty on employers to provide and maintain, as far as reasonably practicable, a working environment that is safe and without risk to the health of staff and pupils.
 - 3.1.2. The term "reasonably practicable" means that the OHSA does not require an employer to eliminate all health and safety risks that might exist, but rather to mitigate those risks insofar as it is able to do so.
 - 3.1.3. Before an employer can assess what reasonable measures it must implement to provide and maintain a safe work environment, it must first conduct a risk assessment, meaning the health and safety risks that exist in the workplace and those that are reasonably foreseeable must be identified.
- 3.2. Reasonable measures include the following:
 - 3.2.1. taking steps to eliminate or mitigate any hazard or potential hazard, before resorting to personal protective equipment;
 - 3.2.2. providing information, instructions, training, workshops and supervision that may be necessary to ensure the health and safety of employees at work; and
 - 3.2.3. enforcing such measures as may be necessary in the interests of health and safety.
- 3.2. Notifying employees of hazards:
 - 3.2.1. Section 13 of the OHSA places a duty on an employer to inform all of its employees of the hazards that exist in the workplace.

- 3.2.2. Section 16 of the OHSA states that the Chief Executive Officer (CEO) (in the case of the School, this would be the Principal) is responsible for ensuring that the duties imposed on the employer by the OHSA are complied with.
- 3.2.3. Section 16(2) of the OHSA permits the Principal to appoint any person under his control to assist with ensuring compliance with the OHSA and its regulations. This appointment does not relieve the Principal of his legal duties and responsibilities. The Principal must be informed on all health and safety matters and be involved in any decision making that could materially affect health and safety at the School.
- 3.2.4. Within the context of COVID-19, there is a clear obligation on the employer to manage the risk of contamination in the School.
- 3.2.5. At the School, the duties and responsibilities are shared between the School's Executive Committee Members (Guy Pearson, Sean King, Peter Westwood and Greg Brown) and implemented by the School's newly established COVID-19 Management Committee which is chaired by the Compliance Officer, Sean King.
- 3.3. The General Safety Regulations:
 - 3.3.1. The General Safety Regulations published under the OHSA prohibit an employer from permitting a person to enter a workplace where the health and safety of such person is at risk.
 - 3.3.2. The Environmental Regulations issued under the OHSA provide that, *inter alia*, the employer must ensure that its premises are ventilated in such a way that the air breathed by employees does not endanger their safety.
- 3.4. The employee's specific duties:
 - 3.4.1. Section 14 of the OHSA provides that employees also have a legal duty to comply with the OHSA and its regulations. Employees are also required to comply with any specific health and safety rules that the employer may have implemented at the workplace, including any lawful instructions that are issued.
 - 3.4.2. Employees have the responsibility to take reasonable care of their own health and safety as well as those of other persons who could be negatively affected by the employee's acts or omissions.
 - 3.4.3. Employees who do not comply with health and safety laws or rules may be disciplined and, where deemed necessary, reported to the Department of Employment and Labour.
 - 3.4.4. An employee who does not disclose that he/she has tested positive for COVID-19, is presenting influenza symptoms or who otherwise has disregarded health and safety laws or rules could be subject to disciplinary action.

- 3.4.5. The employer may be justified in dismissing an employee whose acts or omissions have or could have exposed other employees and/or pupils and the sustainability of the School to very real danger.
- 3.4.6. Within the context of COVID-19, there is a clear obligation on the employee to comply with the policies and measures implemented by the employer with a view to managing the risk of contamination in the School.
- 3.5. Appointment of health and safety representatives:
 - 3.5.1. Section 17 of the OHSA provides that employers who employ 20 or more employees on the premises must appoint health and safety representatives. The representatives' key role is to address work related hazards, risks and dangers with management, the employees and pupils.
 - 3.5.2. Section 17 further provides that business premises must have at least one representative for every 100 employees or part thereof and at least one representative for every 50 employees or part thereof.
- 3.6. Functions of health and safety representatives:

Section 18 of the OHSA requires the employer to ensure that health and safety representatives are properly empowered to perform their duties. Representatives are entitled to attend incident investigations and enquiries, inspect documents and participate in internal health and safety audits.

3.7. Establishment of health and safety committees:

Section 19 of the OHSA requires an employer to establish health and safety committees where applicable, in order for an employer to bring about and maintain, as far as reasonably practicable, a working environment that is safe and without risk to the health of its employees and pupils.

3.8 Although the obligations discussed under this heading are regulated by the OHSA and thus apply to the employer and employees, they apply equally to the School's obligations to provide a safe learning environment for pupils and the pupils' obligations to share that responsibility and to, in particular, comply with all health and safety measures implemented by the School. Parents of pupils also have a responsibility to educate their children regarding COVID-19 in general and impress upon them the need to adhere to all safety protocols put in place at the School.

4. EMPLOYMENT EQUITY ACT NO. 55 OF 1998 ("the EEA")

- 4.1. Section 7(1) of the EEA prohibits medical testing of an employee unless legislation permits or requires the testing or it is justifiable in light of medical facts, employment conditions, social policy, the fair distribution of employee benefits or the inherent requirements of a job.
- 4.2. COVID-19 would qualify as a justifiable medical fact, meaning that employers could justifiably implement the medical testing of employees during the pandemic.

- 4.3. By implementing non-invasive medical testing such as a symptom checks, temperature testing and assessments, an employer may reduce the risk to the individual employee and all other employees and pupils in the School.
- 4.4. COVID-19 poses a greater threat to those who have existing respiratory illnesses or are suffering from chronic diseases. Employees are encouraged to disclose comorbidities in order for precautionary measures to be taken, i.e. they may be requested to continue with their work from home where reasonably practicable.
- 4.5. In terms of section 6 of the EEA the employer must ensure that employees are not discriminated against on the grounds of having tested positive for COVID-19.

5. **PROMOTION OF EQUALITY AND PREVENTION OF UNFAIR DISCRIMINATION ACT NO. 4** OF 2000 ("PEPUDA")

- 5.1 In terms of section 6 of PEPUDA, neither the State nor any person may unfairly discriminate against any person.
- 5.2 Prohibited grounds of discrimination include race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language, birth and HIV/AIDS status; or any other ground where discrimination based on that other ground causes or perpetuates systemic disadvantage; undermines human dignity; or adversely affects the equal enjoyment of a person's rights and freedoms in a serious manner an comparable manner.
- 5.3 Within the context of COVID-19, it shall be permissible to test pupils and other individuals seeking access to the School.

6. BASIC CONDITIONS OF EMPLOYMENT ACT NO. 75 OF 1997 ("the BCEA")

- 6.1. In terms of section 22 of the BCEA the "sick leave cycle" means the period of 36 months' employment with the same employer immediately following the employee's commencement of employment.
- 6.2. During every sick leave cycle, an employee is entitled to an amount of paid sick leave equal to the number of days the employee would normally work during a period of six weeks. Usually (for an employee who works five days a week) this equates to 30 days' sick leave per 36 months of employment.
- 6.3. In terms of section 23 of the BCEA, an employer is not required to pay an employee for sick leave if the employee has been absent from work for more than two consecutive days or on more than two occasions during an eight-week period and, on request by the employer, does not produce a medical certificate stating that the employee was unable to work for the duration of the employee's absence on account of sickness or injury.

7. COMPENSATION FOR OCCUPATIONAL INJURIES AND DISEASES ACT NO. 130 OF 1993 ("COIDA")

7.1. COIDA only protects employers against claims arising out of injuries or diseases contracted by their employees in the course and scope of their employment.

- 7.2. If the employer becomes aware that an employee has contracted COVID-19 whilst at work or performing their work or of an allegation that this is so, then in such event, this must be reported to the Compensation Commissioner within 7 days irrespective of whether the employer may be of the opinion that the employee did not contract COVID-19 in the course and scope of his/her employment.
- 7.3. Provided the employee is incapacitated for more than 3 days, the employee may be entitled to compensation from the Compensation Fund.
- 7.4. The employer has an obligation to pay the employee 75% of his/her earnings for any absence on account of any injury or disease on duty for up to the first 3 months from date of the employee contracting the illness. Such compensation paid by the employer ought to be refunded to it by the Compensation Fund.

8. <u>COMPENSATION FOR LOSS OF INCOME UNDER C19-TERS [TEMPORARY EMPLOYER-</u> <u>EMPLOYEE RELIEF SCHEME (Gov Gazette 43216 8 April 2020)]</u>

- 8.1. As a consequence of the COVID-19 pandemic, a number of staff have been unable to work. A special benefit under the UIF for employees has been created to minimize the economic impact and loss of income for affected employees.
- 8.2. Employers are required to register their businesses with SARS in order to claim from the C19-TERS fund on behalf of these employees.
- 8.3. TERS income supplementary benefits are de-linked from other UIF benefits and processes, and applications are subject to normal verification and processes of the fund.
- 8.4. Benefits from this fund fall into two categories:
 - 8.4.1. Loss of income due to short term shut down: Applicable to an employee who loses income in part or wholly while still being employed due to the temporary closure of the business;
 - 8.4.2. Employers can claim the TERS benefit for their employees who have been required to take annual leave during the lockdown period, as long as those benefits are "set off" against the leave by proportionally crediting the employee's leave entitlement.

D. CHAPTER 4 - COVID-19 RISK ASSESSMENT PLAN

1. **INTRODUCTION**

- 1.1 The regulations require that, subject to the employer's obligations under the OHSA, every employer that employs more than 10 employees must prepare and implement a Risk Assessment Plan aimed at implementing, as a minimum, the measures contained in the regulations and directives to prevent the spread and minimise the impact of COVID-19 in the School.
- 1.2 The Risk Assessment Plan must include any COVID-19 prevention and mitigation plan approved by the Minister of Health and any other Minister of the relevant sector.
- 1.3 If the employer employs more than 500 employees, the employer must submit a record of its risk assessment together with a written policy concerning the protection of the health and safety of its employees from COVID-19 as contemplated in section 7(1) of the OHSA to its health and safety committee; and the Department of Employment and Labour
- 1.4 The School should prepare and plan the complete risk assessment process. This should entail deciding who should be included, what the roles and responsibilities are and what the stages of the assessment will be. The School can do this through an action plan.

2. THE ACTION PLAN

The action plan should include:

- 2.1. commissioning, organising and coordinating the assessment;
- 2.2. appointment of competent people to make the assessments the persons carrying out the risk assessment may be health and safety representatives, external assessors and service providers;
- 2.3. consulting employee/pupil representatives on arrangements for the appointment of those who will make the assessments in accordance with relevant legislation and practices;
- 2.4. providing the necessary information, training, resources and support to health and safety representatives and employees;
- 2.5. involving management and encouraging the participation of the workforce;
- 2.6. taking into account any COVID-19 prevention and mitigation plan approved by the Minister of Health and any other Minister of the relevant sector;
- 2.7. determining the likelihood of contamination in the School;
- 2.8. ensuring that the risk assessment is documented;

- 2.9. providing feedback to employees and pupils and/or their representatives on the results of the risk assessment and on the measures to be introduced;
- 2.10. ensuring that the preventive and protective measures take account of the results of the assessment; and
- 2.11. monitoring and reviewing the protective and preventive measures to ensure that their effectiveness is maintained.

3. STAGED APPROACH TO DEVELOPING A RISK ASSESSMENT PLAN

- 3.1. Step 1 Conduct an Overview
 - 3.1.1. Conduct an overview of all working areas within the School.
 - 3.1.2. Identify the tasks which are performed in the different working areas. This is the starting point for the identification of hazards or risks which are connected with the spread of COVID-19 in the School.
 - 3.1.3. Identify hazards, those at risk and vulnerable employees and pupils such as employees over the age of 60; employees and pupils with weakened immune systems, long-term health conditions; pregnant employees; and disabled employees and pupils.
- 3.2. Step 2 Evaluate and Prioritise
 - 3.2.1. Evaluate and prioritise hazards and risks.
 - 3.2.2. Not all of the identified hazards and risks will have the same importance nor can they all be addressed at the same time. The minimum requirements of the regulations and directives must however be met. Agree which hazards and risks that are not addressed by the minimum requirements should be addressed first taking into account the level of risk of continued exposure and by when the measures will be implemented.
 - 3.2.3. Combatting the spread of COVID-19 in the School should be prioritised and seen as a continuous improvement process of the Bishops COVID-19 Management Committee.
- 3.3. Step 3 Preventative Measures
 - 3.3.1. Preventative measures should be based on the following general principles of prevention:
 - 3.3.1.1. avoiding risks posed by COVID-19;
 - 3.3.1.2. combating the risks at source;
 - 3.3.1.3. adapting the work to the individual, especially as regards the design of the School, the maintenance of it and the utilisation of various venues;

- 3.3.1.4. developing a coherent overall prevention policy which covers technology, organisation of work, working conditions, social relationships and the influence of factors related to the working environment;
- 3.3.1.5. giving collective protective measures priority over individual protective measures;
- 3.3.1.6. giving appropriate instructions to the employees and pupils; and
- 3.3.1.7. ensuring that employees and pupils receive adequate health and safety information and training, in particular in the form of information and instructions specific to their school, through *inter alia* wellness programmes.
- 3.3.2. Preventative measures should include engineering and administrative controls and Personal Protective Equipment ("PPE") where applicable.
- 3.3.3. Engineering controls involve isolating employees and pupils from work-related hazards through measures such as: installing high-efficiency air filters; increasing ventilation rates; installing physical barriers such as face shields or screens where social distancing isn't always possible; and ensuring adequate hygiene standards i.e. availability of handwashing facilities with soap, sanitisers and disinfectants.
- 3.3.4. Administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard such as: encouraging sick employees and pupils to stay at home; minimizing contact amongst employees and pupils, by replacing face-to-face meetings with virtual communications e.g. conference calls, Zoom, Teams etc.; minimizing the number of employees and pupils on site at any given time e.g. rotation or shift work; using multiple classrooms and developing emergency communications plans, including a task team for answering employees' and pupils' concerns.
- 3.3.5. Generally, employees and pupils are required to wear cloth masks at all times; however, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers and pupils, and information on PPE effectiveness. The PPE required during the COVID-19 pandemic will be based on the risk of being infected while working and the job tasks that may lead to exposure.
- 3.4. Step 4 Implementation
 - 3.4.1. Implement the preventive and protective measures according to the prioritisation plan.
 - 3.4.2. Implementation of measures depends greatly on the participation of employees and pupils and their acceptance of the measures and therefore the School and the health and safety representatives should compare and coordinate their efforts to communicate and implement the measures.

- 3.5. Step 5 Documentation, Monitoring and Review
 - 3.5.1. Management and health and safety representatives must document the risk assessment. The documentation should include the results of the risk analysis, the measures implemented (which have been implemented, which will still be implemented and who is responsible for this) and the results of the evaluation of the measures implemented.
 - 3.5.2. The School must notify employees and pupils of the contents of the directives for measures to be implemented as well as the manner in which they will be implemented (the Risk Assessment Plan). Employers who employ more than 500 employees must submit a copy of the plan and the policy concerning the protection of the health and safety of its employees (and pupils) to its health and safety committee and the Department of Employment and Labour.
 - 3.5.3. Management and health and safety representatives should monitor and evaluate the measures implemented. Additional modifications may be necessary if the measures do not produce the expected results. Changes in the work organisation, work environment or level of risk may also require modification to the plan and measures.
 - 3.5.4. The risk assessment plan should be reviewed at regular intervals or whenever significant changes occur, such as an outbreak of COVID-19 which could impact the School; or changes to the alert level.

4. AREAS TO BE ADDRESSED IN THE RISK ASSESSMENT PLAN (SCHOOL PLAN)

- 4.1. Regulation 16(6)(b) of the Disaster Management Regulations, dated 29 April 2020 (available on request) requires a School Plan to be developed in accordance with Annexure E of the Regulations prior to the opening of the School.
- 4.2. A COVID-19 compliance officer must be appointed. This role may be fulfilled by the safety representative or chairperson of the safety committee.
- 4.3. The School Plan must include the following:
 - 4.3.1. The date the School will open and the hours of opening;
 - 4.3.2. The details of the COVID-19 compliance officer;
 - 4.3.3. The timetable setting out the phased return-to-work of employees and the phased return-to-school of pupils, to enable appropriate measure to be taken to avoid and reduce the spread of the virus in the School;
 - 4.3.4. The steps taken to get the School COVID-19 ready;
 - 4.3.5. A list of staff who can work from home: staff who are 60 years or older and staff with comorbidities who will be required to stay at home or work from home.
 - 4.3.6. Arrangements for staff/pupils in the establishment:

- 4.3.6.1. sanitary and social distancing measures and facilities at the entrance and exit to the School;
- 4.3.6.2. screening facilities and systems;
- 4.3.6.3. the attendance-record system and infrastructure;
- 4.3.6.4. the work-area of employees and pupils;
- 4.3.6.5. any designated area where staff/pupils are served e.g. tuckshop and dining areas in boarding houses;
- 4.3.6.6. canteen and bathroom facilities;
- 4.3.6.7. testing facilities (for establishments with more than 500 employees); and
- 4.3.7. Arrangements for members of the public, including sanitation and social distancing measures.

E. <u>CHAPTER 5 - OBLIGATIONS OF BISHOPS COVID-19 COMMITTEE,</u> <u>EMPLOYEES, PUPILS AND PARENTS</u>

The success of the Risk Assessment Plan and the specific measures implemented to combat COVID-19 in the School are dependent on the co-operation of the COVID-19 Management Committee Members and employees and pupils.

1. COVID-19 MANAGEMENT COMMITTEE MEMBERS

COVID-19 Management Committee Members must:

- 1.1 review effectiveness of health and safety measures and regulations;
- 1.2 identify potential hazards and potential major incidents at the School;
- 1.3 examine the cause of incidents at the School;
- 1.4 investigate any complaints by any employee/pupil relating to the employee's/pupil's health and safety at work/school;
- 1.5 make recommendations on matters arising from the above;
- 1.6 make recommendations to the health and safety committee on general matters affecting the School;
- 1.7 inspect the School with a view to the health and safety of employees and pupils at intervals to be specified by the health and safety committee;
- 1.8 attend all meetings of the COVID-19 Management Committee;
- 1.9 monitor effectiveness of PPE to ensure that the employees and pupils are using it correctly;
- 1.10 provide input into restructuring the School's premises in certain respects so as to allow for adequate space between employees and pupils; and
- 1.11 provide input into new rules of conduct on hygiene and risk reduction for COVID-19.

2. EMPLOYEES AND PUPILS

- 2.1. Employees and pupils must:
 - 2.1.1. follow all policies and directions of the School related to combatting the spread of COVID-19;
 - 2.1.2. make correct use of PPE supplied to them;
 - 2.1.3. immediately inform the School or the COVID-19 Committee of any situation they have reasonable grounds for considering to be a serious and immediate danger to health and safety and of any shortcomings in the protection arrangements; and

- 2.1.4. be involved, through the health and safety and pupil representatives, in the process of deciding on the preventive and protective measures to be put in place.
- 2.2. Employees shall furthermore be required to:
 - 2.2.1. Complete and sign a Declaration Form (Annexure "A") on a daily basis when reporting for duty; and
 - 2.2.2. Complete and sign a Declaration Form (Annexure "B") when returning to work for the first time after the nationwide lock-down.

3. **PARENTS**

Before a pupil will be permitted access to the School, his parents/guardians shall be required to complete a Declaration Form (Annexure "C"). The "Parent Daily Declaration Form" must be completed and submitted at the commencement of each school day. No pupil will be permitted access to the School if the Declaration Form reflects that he displays any symptoms associated with COVID-19.

F. <u>CHAPTER 6 – SPECIFIC MEASURES TO COMBAT THE</u> <u>SPREAD OF COVID-19 IN THE SCHOOL</u>

1. ESTABLISHMENT OF WELLNESS PROGRAMS IN THE SCHOOL

- 1.1. The COVID-19 Management Committee must educate employees and pupils on how to use good hygiene and take responsible precautions through wellness programmes.
- 1.2. The COVID-19 Compliance Officer must inform the employees and pupils of any directives issued by the Department of Employment and Labour, the Minister of Health and the relevant sector Minister as well as the manner in which it intends to implement the directives.
- 1.3. Various methods can be used in order to drive the health and safety campaigns including but not limited to health and safety training sessions; displaying posters that provide information on the illness and hygiene; informative e-mails; and communication on chat groups.

2. SCREENING AND ACCESS CONTROL

- 2.1. Every individual seeking access to the School must report whether they suffer from any of the following symptoms:
 - 2.1.1. fever;
 - 2.1.2. cough;
 - 2.1.3. sore throat;
 - 2.1.4. redness of eyes;
 - 2.1.5. shortness of breath and/or difficulty breathing;
 - 2.1.6. body aches;
 - 2.1.7. loss of smell;
 - 2.1.8. loss of taste;
 - 2.1.9. nausea;
 - 2.1.10. vomiting;
 - 2.1.11. diarrhoea;
 - 2.1.12. fatigue;
 - 2.1.13. weakness; or
 - 2.1.14. tiredness.

- 2.2. Any individual who is sick or has symptoms associated with COVID-19 should not be permitted access to the School.
- 2.3. The School must comply with any guidelines issued by the National Department of Health in consultation with the Department of Employment and Labour and any other sector Minister in respect of symptom screening and medical surveillance and testing if required to do so.
- 2.4. Any person that enters the School must be subjected to a screening process where a visual observation as to whether they display any of the symptoms of COVID-19 is performed, where they are requested to disclose any symptoms and are subjected to a temperature test. The temperature test itself should be as non-invasive as possible.
- 2.5. If an individual refuses to be subjected to a temperature test, they may be refused access. The School may rely on other available information or relevant information elicited during an interview and may then take appropriate measures.
- 2.6. In order to determine if an employee/pupil's health is at risk, the School should question employees and pupils regularly as to whether they have any symptoms, whether they have reason to believe they may be at risk i.e. through suspected contact with someone who has contracted COVID-19 or whether they have any comorbidities.
- 2.7. Where there are sufficient grounds to suggest that an employee/pupil may have contracted COVID-19 or been in contact with somebody who has COVID-19 the employee/pupil may be required produce a medical certificate confirming they are cleared to attend the School.
- 2.8. Biometrics or registers which require physical contact or items to be passed back and forth should be discarded for other measures. As far as possible, computerised processes will be implemented.
- 2.9. Any person entering the School should be informed of hygiene standards and measures and should be required to sanitise their hands.

3. HYGIENE

- 3.1. Ensure that the School is safe and sanitised by ensuring that it is properly cleaned with alcohol-based disinfectants before employees and pupils return to the School and regularly thereafter.
- 3.2. Employees and pupils should be encouraged to take the following precautionary measures:
 - 3.2.1. wash their hands vigorously with soap and warm water often for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitiser with an alcohol content of at least 70% or use a sanitiser in conjunction with washing hands;
 - 3.2.2. avoid touching the eyes, nose, and mouth with unwashed hands;
 - 3.2.3. avoid close contact with people who are sick;
 - 3.2.4. avoid shaking hands;

- 3.2.5. avoid physical contact with colleagues, pupils, suppliers, contractors, parents, etc
- 3.2.6. employees and pupils who are sick must stay at home and try and keep a distance from others at home;
- 3.2.7. cover the cough or sneeze with a flexed elbow or a tissue, then throw the tissue in the bin;
- 3.2.8. clean and disinfect frequently touched objects and surfaces including personal devices and touchscreens;
- 3.2.9. avoid physical consultation and communication where possible;
- 3.2.10. avoid unnecessary travel;
- 3.2.11. avoid unnecessary interaction, making use of technology to interact remotely;
- 3.2.12. keep any necessary gathering of employees and pupils to as few people as possible; and
- 3.2.13. make use of personal protective equipment where applicable.
- 3.3. The School is required to ensure that there are adequate facilities for employees and pupils to wash and/or sanitise their hands regularly. These facilities must be available at the entrance to the School, to employees and pupils who work away from the School and at the workstation of employees and pupils for both the employee/pupil and individuals with whom those employees and pupils interact.
- 3.4. The School must ensure that:
 - 3.4.1. all work surfaces and equipment are sanitised before school begins, regularly during school hours and after school ends;
 - 3.4.2. all areas such as toilets, common areas, door handles, shared electronic equipment are regularly cleaned and sanitised;
 - 3.4.3. paper towels are available for employees and pupils who wash their hands (no fabric towels are permitted);
 - 3.4.4. employees and pupils are required to wash their hands and/or sanitise their hands regularly while at school;
 - 3.4.5. employees who interact with the public in reception areas at the School are to sanitise their hands between interactions;
 - 3.4.6. surfaces that employees and pupils and members of the public come into contact with are routinely cleaned and sanitised; and
 - 3.4.7. if appropriate, undertake symptom screening measures of visitors or public in line with the Department of Health's published guidelines, request them to

wear masks when inside the premises and display notices of the precautions which must be observed in the School.

4. SOCIAL DISTANCING

- 4.1. As far as possible the number of employees and pupils at the School must be kept to a minimum through, *inter alia*, implementing a work from home policy, rotation, staggered working hours, shift systems and a staggered re-opening of the School. Where appropriate queue control must be implemented.
- 4.2. A distance of 1.5 metres should be maintained between employees and pupils where practically possible.
- 4.3. It may be necessary to implement shift work and/or schedules for accessing facilities and common areas used such as change rooms, dining areas and bathrooms in order to minimise the number of employees and pupils at the School or in a particular area of the School.
- 4.4. Measures to minimise contact between employees and pupils must also be implemented. This may include utilising video and teleconferencing, putting in place physical barriers, etc.
- 4.5. Where social distancing is not possible or where it is appropriate, in conjunction with social distancing, the School must ensure that there are physical barriers such as face shields, particularly for employees who will interact with suppliers entering the School. If physical barriers are not possible, or where necessary, the School must supply the affected employee with appropriate PPE in line with the risk assessment of the School.
- 4.6. Work practices which require the passing of items amongst employees and pupils should be eliminated where possible.

5. **VENTILATION**

- 5.1. The School must ensure that the School is well ventilated by natural or mechanical means.
- 5.2. The School must ensure that filters of any mechanical ventilation are replaced in accordance with the manufacturer's instructions by a competent person.

6. <u>PPE</u>

- 6.1. All PPE should be:
 - 6.1.1. selected based upon the hazard to the employee;
 - 6.1.2. properly fitted;
 - 6.1.3. consistently and properly worn when required;
 - 6.1.4. regularly inspected, maintained, and replaced, as necessary; and
 - 6.1.5. properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

- 6.2. The School shall provide each of its employees and pupils, free of charge, with a minimum of two cloth masks, which comply with the requirements set out by the Department of Trade, Industry and Competition, which must be worn while at school and while commuting to and from school.
- 6.3. The number of masks to be provided to each employee/pupil must be determined in accordance with any sectoral guideline and taking into account the conditions, in particular where these may result in a mask becoming wet or soiled.
- 6.4. The School shall ensure that employees and pupils are informed, instructed and trained as to the correct use of cloth masks.
- 6.5. The School will make appropriate arrangements for the washing, drying and ironing of cloth masks for boarders and staff in boarding houses.

7. TRANSPORT

- 7.1. Public transportation is one of the hotspots for COVID-19 in general. Employees and pupils who use their own vehicles are still relatively safe compared to those who use alternative public transport.
- 7.2. Consider the mode of transport that employees and pupils will be utilising to get to work.
- 7.3. Educate employees and pupils about utilising safe transport and where at all possible to maintain hygiene standards and social distancing when utilising transport.

8. WORK-FROM-HOME

- 8.1. The School should consider a work-from-home strategy and all staff who can only work remotely should be allowed to do so where this is practicable. This will assist with social distancing in the School.
- 8.2. Employees who are 60 and older, as well as employees and pupils with comorbidities identified by the Department of Health (vulnerable employees and pupils) should be offered a work-from-home or online schooling option where reasonably practicable.
- 8.3. A flexi-working time arrangement which allows different employees to access the School at different times may also be adopted, if required;
- 8.4. The following factors should be taken into consideration when determining whether or not an employee can work from home:
 - 8.4.1. will the employee be eligible by the nature of their job;
 - 8.4.2. is collaboration with the employee's team going to be possible;
 - 8.4.3. the conditions at the employee's home, e.g. connectivity, workspace, personal circumstances such as home schooling of children; and
 - 8.4.4. does the employee have the necessary equipment at home?
- 8.5. Employees approved to work from home should:

- 8.5.1. adhere to all the School's policies and procedures;
- 8.5.2. provide a daily account/details of work undertaken (not applicable to teachers), which should be forwarded to their direct manager and the HR Manager.
- 8.5.3. be contactable during normal working hours;
- 8.5.4. take reasonable precautions necessary to secure the School's equipment;
- 8.5.5. dress professionally when communicating with clients and colleagues on the communication channels i.e. Skype or Zoom or Teams and ensure that the background of their home looks professional and free from noise;
- 8.5.6. keep updated with the School's communications; and
- 8.5.7. maintain social distancing to curb the spread of Covid-19.
- 8.6. The School should:
 - 8.6.1. monitor, coordinate, control and review the employee's performance;
 - 8.6.2. schedule communication meetings including methods of disseminating information to staff who are working from home;
 - 8.6.3. streamline communication channels i.e. Zoom and Skype and Teams;
 - 8.6.4. provide IT support where reasonably practicable;
 - 8.6.5. consider reimbursing the employee for extra costs incurred in working from home taking into account that the employee may also be saving on costs such as transport costs.

9. <u>STEPS TO BE TAKEN WHEN AN EMPLOYEE/PUPIL CONTRACTS OR IS AT RISK OF</u> <u>HAVING CONTRACTED COVID-19</u>

- 9.1. The responsible individuals at the School must know how to identity symptoms of COVID-19 and be clear on any relevant processes and procedures in case someone in the School contracts the virus.
- 9.2. Employees and pupils who have contracted or are at risk of having contracted COVID-19 must be isolated at the School, and transported in a manner that does not place other employees and pupils or members of the public at risk either to be self-isolated or for medical examination or testing. If onsite clinics and medical centres are available, this resource should be utilised for these purposes.
- 9.3. The School must assess the risk of transmission, disinfect the area and the employee/pupil's workstation, refer those employees and pupils who may be at risk for screening and take any other appropriate measures to prevent possible transmission.
- 9.4. The School must inform the Department of Health and the Department of Employment and Labour if an employee/pupil has been diagnosed with COVID-19 as well as give

administrative support to any contact-tracing measures implemented by the Department of Health.

- 9.5. The School must investigate the cause of any control failure and review its risk assessment to determine whether any engineering or administrative controls, as well as PPE requirements, should be amended or adapted.
 - 9.5.1. Compulsory quarantine:
 - 9.5.1.1. The WHO has indicated that a person who is required to quarantine should do so for a minimum period of at least 14 days.
 - 9.5.1.2. If the employee provides a medical certificate, then their absence may be considered as sick leave. If the employee's sick leave is exhausted the employer must make an application for illness benefits through UIF.
 - 9.5.1.3. Where there is evidence that the employee contracted COVID-19 as a result of occupational exposure then the School should lodge a claim for compensation in terms of COIDA.
 - 9.5.1.4. An employee/pupil may only return to the School after compulsory quarantine if:
 - (a) the employee/pupil has undergone a medical evaluation confirming that they have been tested negative for COVID-19;
 - (b) the School ensures that personal hygiene, wearing a mask, social distancing, and cough etiquette is strictly adhered to by the employee/pupil; and
 - (c) the employee/pupil is closely monitored for symptoms upon return to School.
 - 9.5.2. Voluntary quarantine:
 - 9.5.2.1. In the case of voluntary quarantine for precautionary purposes, the employee is not ill and therefore sick leave will not apply.
 - 9.5.2.2. The School and employee may submit confirmation of an agreed precautionary quarantine for 14 days in which case the employee shall qualify for illness benefits from the UIF.
 - 9.5.2.3. An employee/pupil returning to the School after a voluntary quarantine must provide a medical certificate that they may return to the school and pose no danger to the school.

10. PSYCHOLOGICAL WELLBEING OF EMPLOYEES AND PUPILS

10.1. The return to the School for employees and pupils may be difficult with much uncertainty still surrounding the COVID-19 pandemic and measures to combat it, which in turn may affect productivity of employees and pupils. The School should take all possible

measures to ensure support for the employees and pupils' psychological wellbeing. Measures may include providing the employee/pupil's access to trained counsellors or psychologists, or informal sessions where employees and pupils may share their experiences and concerns.

- 10.2. If the employees and pupils have medical aid they may have access to professional help as a benefit of their medical scheme.
- 10.3. The following numbers may be made accessible to employees and pupils for them to access should they so wish:
 - 10.3.1. LIFELINE National Counselling Line 0861-322-322
 - 10.3.2. LIFELINE Gender Violence -0800-150-150
 - 10.3.3. LIFELINE HIV and AIDS Helpline 0800-012-322
 - 10.3.4. COVID-19 Emergency Hotline: 0800 029 999
 - 10.3.5. COVID-19 WhatsApp Support Line: 0600 123456

11. **TRAVEL**

- 11.1. The risk of COVID-19 will persist after the lockdown so employees should avoid nonessential travel, even locally. Where necessary employees and pupils should continue with their online collaboration.
- 11.2. Management should regularly check the alert level travel requirements and the travel advice from the Department of Health.
- 11.3. Employees and pupils should inform management in writing if they have undertaken or are planning to undertake any travel.

12. REDUCING THE RATE OF ABSENTEEISM

In order to curb unnecessary absenteeism and panic, the school will need to ensure that:

- 12.1. there is good communication with all employees and pupils in an effort to keep everyone updated on action being taken to reduce risks of exposure in the School;
- 12.2. everyone's contact numbers and emergency contact details are up to date; and
- 12.3. a proactive approach rather than a reactionary approach is adopted within the context of COVID-19.



ANNEXURE A

Employee Daily Declaration Form

Name:	
Position:	
Cellphone Number:	
ID Number:	
Email:	

Employee Declaration Questionnaire		Yes	No
1.	Have you or anyone you have come into contact with been exposed to someone who has tested positive for COVID-19 or someone who is self-isolating for COVID-19 in the last 14 days?		
2.	Have you or anyone in your home experienced one or more of the following symptoms in the last 7 days: fever, cough, sore throat, redness of eyes, shortness of breath, difficulty in breathing, body aches, loss of smell, loss of taste, nausea, vomiting, diarrhoea, fatigue, weakness or tiredness?		
3.	Is your temperature reading currently above 37.5°?		

We remind you of the following:

- 1. You are required to maintain a 1.5 meter distance between yourself and others ;
- 2. You are required to wear a clean/washed cloth mask or face shield in the workplace at all times;
- 3. You are required to avoid any direct physical contact with others;
- 4. If you sneeze or cough, you must do so into your flexed elbow or a tissue (after which you must throw the tissue away);
- 5. Hand sanitisers have been placed throughout the workplace. Kindly ensure that you continually sanitise your hands, particularly after using other objects in the workplace which others may have touched such as the photocopier etc.
- 6. Remember to avoid touching your face;
- 7. If you have any concerns regarding COVID-19 or begin to display symptoms, you must immediately report this to your superior who will provide you with guidance and assistance.
- 8. If you have a comorbidity (i.e. hypertension, diabetes, cardiovascular disease and/or respiratory system disease) you are encouraged to disclose this to your employer for assistance.
- 9. The School reserves the right of access to our facilities.

I hereby declare that to the best of my knowledge that the information disclosed is correct at the time of completion. I further undertake to inform my immediate superior should I be diagnosed with COVID-19 or begin to display COVID-19 like symptoms.

I accept that going forward, submitting an online form will have the same effect as me signing the form personally.

I understand that a breach of the above requirements or a false declaration may, depending on the circumstances, constitute a disciplinary transgression and, given the nature of the Covid-19 pandemic, may be regarded as serious and give rise to disciplinary action.

I acknowledge further that, by signing this form, I will enter Diocesan College (Bishops) premises entirely at my own risk. I hereby indemnify the School against all claims of any nature which may arise should I contract COVID-19 in the workplace and understand that any claim I may have will lie against the Compensation Commissioner in terms of the Compensation for Occupational Injury and Diseases Act, No. 130 of 1993.

.....

Employee's signature

.....

Employee's name

.....

Date



ANNEXURE B

Employee Return-to-Work Declaration Form

Name:					
Position:					
Cellphone Number:					
ID Num	lber:				
Email:					
<u>Comple</u>	<u>ete</u>				
1. Is your health compromised in any way that prohibits you from coming to worl pandemic?					
	If yes, please submit a Doctor's Certificate to the HR Manager to support this response.				
2.	Do you have health compromised family members at home that require you to be extra cautious during CODIV-19? (Yes/ No)				
	If yes, please explain				
3.	•	g else we should be aware of that will make returning to work difficult for you? (Yes/No)			
	lf yes, please ex	cplain			
4.	[Only complete	this section if you are over the age of 60]			
	The government recommends that persons over the age of 60 work from home if possible.				
	Is it your intention	on to come back to work when required? (Yes/No)			

If you are over 60, unable to work from home and unable to fulfil your work duties from home then regrettably your absence may be treated as temporary unpaid leave of absence, since you may be unable to fulfil your contractual obligations. Each case will be determined on its own merits as to the risk posed to you in returning to work and the extent to which that risk can reasonably be mitigated through special measures.

I agree to the following requirements applicable to Stage 4 COVID-19:

- 1. I will ensure that my temperature has been checked prior to entering my designated place of work;
- 2. I will maintain a 1.5 meter distance between myself and others at all times and avoid any direct physical contact with others;
- 3. I have received 2 masks from the School. I will label the mask with my name. I understand that it is my responsibility to keep my mask freshly laundered every day;
- 4. If I sneeze or cough, I will do so into my flexed elbow or use a tissue which I will dispose of;
- 5. I will continually sanitize my hands, particularly after using other objects in the workplace which other employees may have touched such as the photocopier etc;
- 6. I will avoid touching my face as much as possible;
- 7. If I have any concerns regarding COVID-19 or begin to display symptoms (i.e. fever, cough, sore throat, redness of eyes, shortness of breath, difficulty in breathing, body aches, loss of smell, loss of taste, nausea, vomiting, diarrhea, fatigue, weakness or tiredness), I will immediately report this to my superior;
- 8. If I have a comorbidity (i.e. hypertension, diabetes, cardiovascular disease and/or respiratory system disease), I undertake to disclose this to my employer;
- 9. If I am not feeling well, I will not come to work. I will contact my team leader and notify him/her of any changes to my health status;
- 10. If, during the course of my working day, I am not feeling well, I will contact my team leader and advise him/her accordingly and follow the prescribed process (attached)

I understand that a breach of the above requirements may, depending on the circumstances, constitute a disciplinary transgression and, given the nature of the Covid-19 pandemic, may be regarded as serious and give rise to disciplinary action.

I acknowledge further that, by signing this form, I will enter Diocesan College (Bishops) premises entirely at my own risk. I hereby indemnify the School against all claims of any nature which may arise should I contract COVID-19 in the workplace and understand that any claim I may have will lie against the Compensation Commissioner in terms of the Compensation for Occupational Injury and Diseases Act, No. 130 of 1993.

.....

Employee's signature

.....

Employee's name



ANNEXURE C

Parent Daily Declaration Form

Parent Name:	
Pupil Name:	
Pupil Name (2):	
Pupil Grade:	
Parent Cellphone:	

Please note that the onus is on you, the parent, to ensure that your son is healthy before sending him to school.

By signing this document, you agree to the following:

- 1. You will **screen** your son for the symptoms and take him through the **guidelines** every day;
- Should **anyone** in your family (including your son) be diagnosed with COVID-19 or begin to display COVID-19 like symptoms, you will report this immediately to your son's teacher (Pre-Prep/Prep) or House Director (Prep/College);
- 3. If your son has any comorbidity that poses a risk to him with COVID-19, you will inform his teacher/tutor/house master accordingly;
- 4. You indemnify the school against all claims of any nature which may arise should your son or any family member contract COVID-19 while at school;
- 5. The school reserves the right to restrict access.

Your son's temperature will be recorded every day on arrival at the school. An online application will be utilized to record this. Once entered on the app, an email will be sent to your son's Bishops email address as confirmation. A dated sticker will be placed on his collar confirming that he has been successfully screened.

Bishops Management and Staff are very grateful to you for adhering to this process.

Screen for the symptoms EVERY DAY before sending your son to school	Yes	No
Does he have a dry cough?		
Is he tired and weak?		

Does he have a temperature?	
Does he have a sore throat?	
Is his body sore?	
Does he have diarrhea?	
Has he lost his sense of taste/smell?	
Is he battling to breathe?	
Are his eyes red?	
Is he nauseous?	
Does he have a headache?	
If you have access to a thermometer, does your child's temperature currently read above 37.5°?	

Guidelines to remind your son of EVERY DAY:

- 1. He is to maintain a 1.5m distance between himself and any other person, at school and anywhere else;
- 2. He **must** wear his clean/washed cloth mask at all times;
- 3. He may not have any direct physical contact with other pupils and staff, or any other person outside of the safety of his home;
- 4. If he sneezes or coughs, he must do so into a flexed elbow or a tissue (after which the tissue must be thrown away);
- 5. He must regularly sanitise his hands, after using other objects at school which other pupils or staff may have touched, such as door handles or taps etc. (Hand sanitisers have been placed throughout the school);
- 6. He must refrain from touching his face as far as possible;
- 7. If he should start feeling sick at any stage, he should immediately report this to you, his parent, if he is at home, and if he is at school, to his teacher/tutor/house master.

Parent's/Guardian's Name	Parent's/Guardian's Signature	Date
Parent's/Guardian's Name	Parent's/Guardian's Signature	Date