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| **Barnsley Metropolitan Borough Council**  **Risk Assessment Form (RA3)** |



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| **Task / Activity:** | **Lockdown – Partial Opening of Schools – (Covid-19)** | **Ref:** |  |

**Primary (reception onwards) and Secondary schools will remain open for**[**vulnerable children and the children of critical workers**](https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-educational-provision/guidance-for-schools-colleges-and-local-authorities-on-maintaining-educational-provision)**. All other children will learn remotely until February half term.**

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| Directorate: | **Schools** | Date of Assessment: | **January 2021** |
| Business Unit: |  | Manager Responsible for Basic Activity: |  |
| Service / Function: | **Primary/Secondary Schools** | Lead Risk Assessor for Basic Activity: |  |
| Location: |  | Risk Assessment Team Members ((e.g. employees, supervisors, managers, safety reps etc) |  |

This guidance was produced in conjunction with [Restricting attendance during the national lockdown (Schools)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/950510/School_national_restrictions_guidance.pdf) government guidance

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| **Hazard** | **Risks** | **Control Measures** | **Actions Required** | **Person Responsible and Target Date** |
| Schools Premise | Personal injury    Fire  Legionella  Electrical, Gas and Ventilation systems  Infection of coronavirus | * Undertake a workplace inspection to ensure adequate working environment, equipment, fire safety and emergency arrangements are in place. * Fire Risk Assessment to be reviewed and the Fire log-book is up to date. * Legionella checks are to be up to date. * Electrical, gas and ventilation systems checks are up to date. * Increased cleaning regime. | Ensure that spaces are well ventilated and a comfortable teaching environment is maintained. |  |
| Infection Control | Infection of coronavirus  Dealing with direct transmission (e.g. close contact with those sneezing/coughing) and indirect transmission (e.g. touching contaminated surfaces | * Minimise contact with individuals who are unwell by ensuring that those who have coronavirus (COVID-19) symptoms, or who have someone in their household who does, do not attend school * School to response to any infection by: * Engage with the NHS test and trace process and contact their local [Public Health England health protection team](https://www.gov.uk/guidance/contacts-phe-health-protection-teams) * Manage confirmed cases of coronavirus (COVID-19) amongst the school community. School should contact the local health protection team. This team will also contact schools directly if they become aware that someone who has tested positive for coronavirus (COVID-19) attended the school – as identified by NHS Test and Trace. * Contain any outbreak. Where school have two or more confirmed cases within 14 days, or an overall rise in sickness absence where coronavirus (COVID-19) is suspected, they may have an outbreak, and must work with their local health protection team who will be able to advise if additional action is required. * Clean hands thoroughly more often than usual. Coronavirus (COVID-19) is an easy virus to kill when it is on skin. This can be done with soap and running water or hand sanitiser. Schools must ensure that pupils clean their hands regularly, including when they arrive at school, when they return from breaks, when they change rooms and before and after eating. Regular and thorough hand cleaning is going to be needed for the foreseeable future * School to have sufficient hand washing or hand sanitiser ‘stations’ available so that all pupils and staff can clean their hands regularly. * Supervision of hand sanitiser use given risks around ingestion. Small children and pupils with complex needs should continue to be helped to clean their hands properly. Skin friendly skin cleaning wipes can be used as an alternative. * Ensure good respiratory hygiene by promoting the ‘catch it, bin it, kill it’ approach. * As with hand cleaning, schools must ensure younger children and those with complex needs are helped to get this right, and all pupils understand that this is now part of how school operates. Some pupils with complex needs will struggle to maintain as good respiratory hygiene as their peers, for example those who spit uncontrollably or use saliva as a sensory stimulant. This should be considered in risk assessments in order to support these pupils and the staff working with them. * Introduce enhanced cleaning, including cleaning frequently touched surfaces often, using standard products such as detergents and bleach. * School to put in place a cleaning schedule that ensures cleaning is generally enhanced and includes:   + more frequent cleaning of rooms/ shared areas that are used by different groups   + frequently touched surfaces being cleaned more often than normal   *Note: different groups don’t need to be allocated their own toilet blocks, but toilets will need to be cleaned regularly and pupils must be encouraged to clean their hands thoroughly after using the toilet.* | * School to provide tissues and bins available in the school to support pupils and staff to follow this routine. |  |
| Infection control | **Transmission of coronavirus** | * Minimise contact between individuals and maintain social distancing wherever possible * Reduce the number of contacts between children and staff. This can be achieved through keeping groups separate (in ‘bubbles’) and through maintaining distance between individuals. * These are not alternative options and both measures will help, but the balance between them will change depending on: * children’s ability to distance * layout of the school * the feasibility of keeping distinct groups separate while offering a broad curriculum (especially at secondary) |  |  |
| Child/staff member becomes unwell at school with coronavirus symptoms, or have someone in their household | **Transmission of coronavirus** | * Ensure that pupils, staff and other adults do not come into the school if they have [coronavirus (COVID-19) symptoms](https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works#people-who-develop-symptoms-of-coronavirus), or have tested positive in the last 10 days, and ensuring anyone developing those symptoms during the school day is sent home. * If anyone in the school becomes unwell with a new, continuous cough or a high temperature, or has a loss of, or change in, their normal sense of taste or smell (anosmia), they must be sent home and advised to follow ‘[stay at home: guidance for households with possible or confirmed coronavirus (COVID-19) infection](https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance)’, which sets out that they must self-isolate and should [arrange to have a test](https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested) to see if they have coronavirus (COVID-19). Other members of their household (including any siblings) should self-isolate (in accordance with the current government guidance) from when the symptomatic person first had symptoms. * If they have tested positive whilst not experiencing symptoms but develop symptoms during the isolation period, they should restart the 10 day isolation period from the day they develop symptoms. * Where a child is awaiting collection, they should be moved, if possible, to a room where they can be isolated behind a closed door, depending on the age and needs of the child, with appropriate adult supervision if required. Ideally, a window should be opened for ventilation. If it is not possible to isolate them, move them to an area which is at least 2 metres away from other people. * If the child needs to go to the bathroom while waiting to be collected, they should use a separate bathroom if possible. The bathroom must be cleaned and disinfected using standard cleaning products before being used by anyone else. * PPE must be worn by staff caring for the child while they await collection if a distance of 2 metres cannot be maintained (such as for a very young child or a child with complex needs). More information on PPE use can be found in the [safe working in education, childcare and children’s social care settings, including the use of personal protective equipment (PPE)](https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care/safe-working-in-education-childcare-and-childrens-social-care-settings-including-the-use-of-personal-protective-equipment-ppe) guidance. | * As is usual practice, in an emergency, call 999 if someone is seriously ill or injured or their life is at risk. Anyone with coronavirus (COVID-19) symptoms should not visit the GP, pharmacy, urgent care centre or a hospital. * Any members of staff who have helped someone with symptoms and any pupils who have been in close contact with them do not need to go home to self-isolate unless they develop symptoms themselves (in which case, they should arrange a test) or if the symptomatic person subsequently tests positive (see below) or they have been requested to do so by NHS Test and Trace. * Everyone must wash their hands thoroughly for 20 seconds with soap and running water or use hand sanitiser after any contact with someone who is unwell. The area around the person with symptoms must be cleaned with normal household bleach after they have left to reduce the risk of passing the infection on to other people. See the [COVID-19: cleaning of non-healthcare settings guidance](https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings). * Public Health England is clear that routinely taking the temperature of pupils is not recommended as this is an unreliable method for identifying coronavirus (COVID-19). |  |
| Face Coverings | Spread of infection (coronavirus)  **Exemptions** | Under national lockdown, in settings where pupils in Year 7 and above are educated, face coverings should be worn by adults and pupils when moving around the premises, outside of classrooms, such as in corridors and communal areas where social distancing cannot easily be maintained. **This does not apply to younger children in primary schools and in early.**   * Face coverings to be worn correctly and that clear instructions are provided to staff, children and young people on [how to put on, remove, store and dispose of face coverings](https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own) in all of the circumstances above, to avoid inadvertently increasing the risks of transmission. * Safe wearing of face coverings requires cleaning of hands before and after touching – including to remove or put them on – and the safe storage of them in individual, sealable plastic bags between use. Where a face covering becomes damp, it should not be worn and the face covering should be replaced carefully. * Face coverings will not generally be necessary in the classroom even where social distancing is not possible. There is greater use of the system of controls for minimising risk, including through keeping in small and consistent groups or bubbles, and greater scope for physical distancing by staff within classrooms. Face coverings can have a negative impact on learning and teaching and so their use in the classroom should be avoided.   Some individuals are exempt from wearing face coverings. This applies to those who:   * cannot put on, wear or remove a face covering because of a physical or mental illness or impairment or disability * speak to or provide assistance to someone who relies on lip reading, clear sound or facial expression to communicate   The same exemptions will apply in education settings, and we would expect teachers and other staff to be sensitive to those needs.  **Further guidance on face coverings**  Safe working in education, childcare and children’s social care providers <https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care/safe-working-in-education-childcare-and-childrens-social-care-settings-including-the-use-of-personal-protective-equipment-ppe>  Face coverings in education settings <https://www.gov.uk/government/publications/face-coverings-in-education/face-coverings-in-education> |  |  |
| Personal Protective Equipment (PPE) | Infection Control | PPE is only needed in a very small number of cases, including:   * where an individual child or young person becomes ill with coronavirus (COVID-19) symptoms while at schools, and only then if a distance of 2 metres cannot be maintained * where a child or young person already has routine intimate care needs that involves the use of PPE, in which case the same PPE should continue to be used   For more information on PPE, please see BMBC’s guidance [..\..\..\1 Health and Safety Management\Covid-19 HASS ON SHAREPOINT\Use and Management of PPE Supplies for Covid19 including face coverings v 1point11 08 October 2020.docx](file:///\\bmbcdata3\c_data\H-Safety\Central%20Health%20and%20Safety%20Unit\Safety%20Management%20System\1%20Health%20and%20Safety%20Management\Covid-19%20HASS%20ON%20SHAREPOINT\Use%20and%20Management%20of%20PPE%20Supplies%20for%20Covid19%20including%20face%20coverings%20v%201point11%2008%20October%202020.docx) guidance on [safe working in education, childcare and children’s social care](https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care) |  |  |
| Groups of children who should attend school | Critical Workers  Vulnerable Children and Young People | Parents whose work is critical to the coronavirus (COVID-19) and EU transition response include those who work in health and social care and in other key sectors. Children with at least one parent or carer who is a critical worker can go to school if required. This includes parents who may be working from home.  The definition of vulnerable children and young people includes children who have a social worker, an education, health and care plan (EHCP) or who may be vulnerable for another reason at local discretion (“otherwise vulnerable”).  Schools are expected to allow and strongly encourage vulnerable children and young people to attend. Parents/carers of vulnerable children and young people are strongly encouraged to take up the place. If vulnerable children and young people do not attend, schools should:   * work together with the local authority and social worker (where applicable) to follow up with the parent or carer to explore the reason for absence, discussing their concerns using supporting guidance considering the child’s circumstances and their best interests * work together with the local authority and social worker (where applicable) and other relevant partners to encourage the child or young person to attend educational provision, particularly where the social worker agrees that the child or young person’s attendance would be appropriate Where schools grant a leave of absence to a vulnerable child or young person they should still speak to parents and carers, and social workers (where applicable) to explore the reasons for this and any concerns raised. The discussions should focus on the welfare of the child or young person and ensuring that the child or young person is able to access appropriate education and support while they are at home. | Schools should speak to parents and carers to identify who needs to go to school. If it proves necessary, schools can ask for simple evidence that the parent in question is a critical worker, such as their work ID badge or pay slip. Parents and carers who are critical workers should keep their children at home if they can.  Where providers have had to temporarily stop on-site provision on public health advice, they should inform the local authority to discuss alternative arrangements for vulnerable children and young people and work towards welcoming back pupils as soon as possible, where feasible to do so. |  |
| Groups/Bubbles | Spread of infection (coronavirus) | Consistent groups reduce the risk of transmission by limiting the number of pupils and staff in contact with each other to only those within the group.  Maintaining distinct groups or ‘bubbles’ that do not mix makes it quicker and easier in the event of a positive case to identify those who may need to self-isolate, and keep that number as small as possible.   * Groups should be kept apart, meaning that schools should avoid large gatherings such as assemblies or collective worship with more than one group. * When timetabling, groups should be kept apart and movement around the school site kept to a minimum. While passing briefly in the corridor or playground is low risk, schools should avoid creating busy corridors, entrances and exits. * School to consider staggered break times and lunch times (and time for cleaning surfaces in the dining hall between groups). * Schools should also plan how shared staff spaces are set up and used to help staff to distance from each other. Use of staff rooms should be minimised, although staff must still have a break of a reasonable length during the day. |  |  |
| Classrooms | Spread of infection (coronavirus) | * Maintaining a distance between people whilst inside and reducing the amount of time they are in face to face to contact lowers the risk of transmission. * Staff should avoid close face to face contact and minimise time spent within 1 metre of anyone. Similarly, it will not be possible when working with many pupils who have complex needs or who need close contact care. These pupils’ educational and care support should be provided as normal. * It is strong public health advice that staff in **Secondary schools** maintain distance from their pupils, staying at the front of the class, and away from their colleagues where possible. Ideally, adults should maintain 2 metre distance from each other, and from children. * **Primary schools -** this is not always possible, particularly when working with younger children, but adults should maintain 2 metre distance from each other, and from children where possible. * For children old enough, they should also be supported to maintain distance and not touch staff and their peers where possible. This will not be possible for the youngest children and some children with complex needs and it is not feasible in some schools where space does not allow. Schools doing this where they can, and even doing this some of the time, will help. * Schools should make small adaptations to the classroom to support distancing where possible. That should include seating pupil’s side by side and facing forwards, rather than face to face or side on, and might include moving unnecessary furniture out of classrooms to make more space. * When staff or children cannot maintain distancing, particularly with younger children in primary schools, the risk can also be reduced by keeping pupils in the smaller, class-sized groups. |  |  |
| Drop off and pick up routines | Transmission of the coronavirus between parents/children | * Schools to operate for their normal hours. * School to consider staggered starts or adjusting start and finish times to keep groups apart as they arrive and leave school. * A staggered start may, for example, include condensing / staggering free periods or break time but retaining the same amount of teaching time, or keeping the length of the day the same but starting and finishing later to avoid rush hour. * Schools to communicate this to parents and remind them about the process that has been agreed for drop off and collection, including that gathering at the school gates and otherwise coming onto the site without an appointment is not allowed. | . |  |
| Dedicated School Transport | Spread of infection | Transport services to education settings should continue to be provided. The transport to school and other places of education: 2020 to 2021 academic year guidance remains in place  <https://www.gov.uk/government/publications/transport-to-school-and-other-places-of-education-autumn-term-2020/transport-to-school-and-other-places-of-education-autumn-term-2020>   * Those involved in the provision of home to school or college transport must do all that is reasonably practicable to maximise social distancing where possible and minimise the risk of transmission. * What is practicable is likely to vary according to local circumstances. * Local authorities are not required to uniformly apply the social distancing guidelines for public transport, on dedicated school or college transport. However, distancing should still be put in place within vehicles wherever possible. This means that where fewer children and young people are attending school or college, sufficient levels of capacity should be maintained to maximise social distancing. For example, through alternate seating or separation between year groups or schools. Children, young people and staff can continue to use public transport where necessary. * School to encourage everyone to walk, cycle or scoot wherever possible and safe. This will help to reduce pressure on the public transport network and allow social distancing to be practised. * Where children, young people and staff need to use public transport, they should follow the safer travel guidance. * In accordance with advice from PHE, children and young people aged 11 and over must wear a face covering when travelling on dedicated transport to secondary school. This does not apply to people who are exempt from wearing a face covering on public transport. |  |  |
| Equipment | Spread of infection (coronavirus) via use of shared equipment | Measures to take when handling equipment, including instruments, include the following:   * Requiring increased handwashing before and after handling equipment, especially if being used by more than one person. * Avoid sharing equipment wherever possible. Place name labels on equipment to help identify the designated user. * Classroom based resources, such as books and games, can be used and shared within the bubble; these are to be cleaned regularly, along with all frequently touched surfaces. * Pupils limit the amount of equipment they bring into school each day, to essentials such as lunch boxes, hats, coats, books, stationery and mobile phones. Bags are allowed. * Resources that are shared between classes or bubbles, such as sports, art and science equipment should be cleaned frequently and meticulously and always between bubbles or rotated to allow them to be left unused and out of reach for a period of 48 hours (72 hours for plastics) between use by different bubbles. * Pupils and teachers can take books and other shared resources home, although unnecessary sharing should be avoided, especially where this does not contribute to pupil education and development. Similar rules on hand cleaning, cleaning of the resources and rotation should apply to these resources. |  |  |
| Pupils with education, health and care plans or on SEN support | Spread of infection (coronavirus) | * Pupils with SEND (whether with education, health and care plans or on SEN support) will need specific help and preparation for the changes to routine that this will involve. * Teachers and special educational needs coordinators are to plan to meet these needs. |  |  |
| Clinically extremely vulnerable staff  Clinically Vulnerable staff  Pregnant Staff  Staff who may otherwise be at increased risk from coronavirus (covid-19) | Increased susceptibility of infection | Following the reintroduction of shielding, clinically extremely vulnerable staff are advised that they should not attend the workplace.   * Clinically extremely vulnerable individuals are those identified through a letter from the NHS or a specialist doctor as in the group deemed clinically extremely vulnerable (CEV or shielding list). Staff who are identified as clinically extremely vulnerable should follow the published guidance. * Staff should talk to their employers about how they will be supported, including to work from home. * Schools should continue to pay clinically extremely vulnerable staff on their usual terms. 31 Those living with someone who is clinically extremely vulnerable can still attend work where home-working is not possible.   Clinically vulnerable staff can continue to attend school where it is not possible to work from home.   * While in school they should follow the sector-specific measures in this document to minimise the risks of transmission. This includes taking particular care to observe good hand and respiratory hygiene, minimising contact and maintaining social distancing in line with the provisions set out in the ‘prevention’ section of this guidance. * This provides that ideally, adults should maintain 2 metre distance from others, and where this is not possible avoid close face to face contact and minimise time spent within 1 metre of others. While the risk of transmission between young children and adults is likely to be low, adults should continue to take care to socially distance from other adults including older children and adolescents. * People who live with those who are clinically vulnerable or clinically extremely vulnerable can attend the workplace but should ensure they maintain good prevention practice in the workplace and home settings.   Staff who are pregnant As per national restrictions, staff should work at home where possible.   * If home working is not possible, pregnant staff and their employers should follow the advice in the Coronavirus (COVID-19): advice for pregnant employees. * Pregnant women are in the ‘clinically vulnerable’ category and are generally advised to follow the above advice, which applies to all staff in schools. All pregnant women should take particular care to practise frequent thorough hand washing, and cleaning of frequently touched areas in their home or workspace, and follow the measures set out in the system of controls section of this guidance to minimise the risks of transmission. * Pregnant women are not advised to be vaccinated against COVID-19. An employer’s workplace risk assessment should already consider any risks to female employees of childbearing age and, in particular, risks to new and expectant mothers (for example, from working conditions, or the use of physical, chemical or biological agents). * Any risks identified must be included and managed as part of the general workplace risk assessment. * As part of their risk assessment, employers should consider whether adapting duties and/or facilitating home working may be appropriate to mitigate risks.   Some people with particular characteristics may be at comparatively increased risk from coronavirus (COVID-19).   * Where it is not possible to work from home, these staff can attend school as long as the system of controls set out in this guidance are in place. The reasons for the disparities are complex and there is ongoing research to understand and translate these findings for individuals in the future. Further information is available at <https://www.gov.uk/government/publications/drivers-of-the-higher-covid-19-incidence-morbidity-and-mortality-among-minority-ethnic-groups-23-september-2020> * People who live with those who may have comparatively increased risk from coronavirus (COVID-19) can attend the workplace where it is not possible to work from home. |  |  |
| Supply teachers, peripatetic teachers and or temporary staff | Movement around schools - spread of infection (coronavirus) | * Supply teachers, peripatetic teachers and/or other temporary staff can move between schools. * They should ensure they minimise contact and maintain as much distance as possible from other staff. Specialists, therapists, clinicians and other support staff for pupils with SEND should provide interventions as usual. * School to consider how to manage other visitors to the site, such as contractors, and ensure site guidance on physical distancing and hygiene is explained to visitors on or before arrival. Where visits can happen outside of school hours, they should. * To minimise the numbers of temporary staff entering the school premises, and secure best value, schools may wish to use longer assignments with supply staff and agree a minimum number of hours across the remainder of the academic year. * A record is to be kept of all visitors. |  |  |
| Outdoor playground equipment | Spread of infection (coronavirus) | * Outdoor playground equipment to be more frequently cleaned. * After use of equipment children are to clean hands thoroughly. |  |  |
| Extra-curricular provision e.g. breakfast/afterschool clubs | Spread of infection (coronavirus) | * Schools should continue to offer wraparound provision, such as breakfast and afterschool clubs, for those children eligible to attend school (i.e. children of critical workers and vulnerable children and young people). Resuming this provision is important to ensure that parents and carers who are critical workers can continue to work, as well as to provide enriching activities for vulnerable children that improve their wellbeing or support their education. * Schools should also work closely with any external wraparound providers which these pupils may use, to ensure as far as possible, children can be kept in a group with other children from the same bubble they are in during the school day. | Where it is not possible, or it is impractical to group children in the same bubbles as they are in during the school day - for example, if only one or two children are attending wraparound provision from the same school day bubble - schools and external providers may need to group children with others from outside their school day bubble or from a different school, where children from multiple schools are attending provision. If schools or external providers need to do this, they should seek to keep children in small, consistent groups with the same children each time, as far as this is possible. If necessary, it would be appropriate for one staff member to supervise up to two small groups, provided that any relevant ratio requirements are met. |  |
| Physical activity in school | Spread of infection (coronavirus) through contact | Schools have the flexibility to decide how physical education, sport and physical activity will be provided to pupils attending school while following the measures in their system of controls.   * Pupils should be kept in consistent groups, sports equipment thoroughly cleaned between each use by different individual groups. Schools can hold PE lessons indoors, including those that involve activities related to team sports, for example practising specific techniques, within their own system of controls. * However, outdoor activities and sports should be prioritised where possible, and large indoor spaces used where it is not, maximising natural ventilation flows (through opening windows and doors or using air conditioning systems wherever possible) distancing between pupils and paying scrupulous attention to cleaning and hygiene. * This is particularly important in a sports setting because of the way in which people breathe during exercise.   Schools should refer to the following advice:   * advice from organisations such as the [Association for Physical Education](https://www.afpe.org.uk/physical-education/wp-content/uploads/COVID-19-Interpreting-the-Government-Guidance-in-a-PESSPA-Context-FINAL.pdf.) and the [Youth Sport Trust](https://www.youthsporttrust.org/coronavirus-support-schools) * Activities such as active miles, making break times and lessons active and encouraging active travel help enable pupils to be physically active while encouraging physical distancing. | The ability for schools to offer team sports is likely to be limited. Where schools are considering team sports schools must only consider those sports whose national governing bodies have developed guidance under the principles of the government’s guidance on team sport and been approved by the government i.e. sports on the list available at grassroots sports guidance for safe provision including team sport, contact combat sport and organised sport events. Competition between different schools should not take place. Schools should refer to advice from organisations such as the Association for Physical Education, Sport England and Youth Sport Trust. |  |
| Educational Visits | Spread of infection (coronavirus) | The government advise against educational visits at this time.  This advice will be kept under review.  The Association of British Insurers (ABI) has produced information on travel insurance implications following the coronavirus (COVID-19) outbreak.  If schools have any further questions about their cover or would like further reassurance, they should contact their travel insurance provider |  |  |

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| Manager’s Assessment Acceptance Statement | |
| I accept the details of the assessment and will ensure that the risk control measures identified, any risk control actions identified and monitoring requirements are acted upon within the given time scales. | |
| Manager’s Signature |  |
| Date |  |
| Date of planned review (not to exceed 12 months) |  |
| Date of planned full re-assessment (not to exceed 24 months) |  |