CSAP 2022 – Term 3 Updates

UPDATING AND REVIEWING THE CSAP

The CSAP remains the key WHS document to record the identification of risks and assess the effectiveness of control measures. As a 'live' document, the CSAP must be reviewed periodically and following any incident where controls appear to have been ineffective. Versions should be saved to demonstrate reviews are occurring. **The updates and advice in this document have been prepared in a manner to support you to 'cut' 'paste' and edit relevant sections into your existing CSAP to keep the document current.**

STAFF CONSULTATION ON THE CSAP

Staff consultation on workplace WHS risks, hazards and controls is a legislated requirement under the Work Health and Safety Act 2011. Any updates or changes made on your CSAP **must be consulted** on with your staff and appropriate evidence gathered and maintained to demonstrate consultation has taken place with staff.

ASSISTANCE

For assistance in identifying, assessing and managing risks and hazards;

Work Health and Safety
✉ whs.edu@act.gov.au ☎ 02 6207 0614

For assistance in staff consultation requirements, interpreting and applying policies and leave guidance;

HR Business Partnerships
✉ hrbp.edu@act.gov.au ☎ 02 6207 0614

INTRODUCTION

The Education Directorate and all its settings continue to take precautions to limit the spread of COVID-19 to keep our community safe. This *COVID 2022 Term 3 Commencement Update* reviews the requirements to keep our schools and workplaces safe. It is guided by and complies with:

- ACT Public School COVID-19 Management Plan
- National Framework for Managing COVID-19 in Schools and Early Childhood Education and Care Settings
- Australian Health Protection Principal Committee.
- Public Health Emergency Direction Notifiable Instrument NI2021-713 regarding mandatory vaccination at relevant sites
- Chief Minister and Head of Service advice and directions
- ACT Health advice
- Safe Work Australia guidance
- WorkSafe ACT requirements
- Service continuity planning at Government, Directorate and School levels
- Current known information about:
  - Current and emerging needs of our staff, students, and their families
  - Effectiveness of controls to prevent virus incursion into our schools and colleges
  - Management of incidents of virus incursion into our schools and colleges
  - Transmissibility and severity of current variants

o Community transmission in the ACT and nation-wide

BASELINE RISK CONTROLS

The baseline risk controls remain unchanged from term 2 2022. COVID smart behaviors should continue to be strongly encouraged, including physical distancing where possible, practicing good hand and respiratory hygiene practices, and staying home if unwell. Staff and students over 12 years are also encouraged to wear a face mask while indoors.

[Physical distancing where possible, staying home if unwell, hand hygiene, environmental cleaning, ventilation]

ADDITIONAL CONTROLS

When there are high numbers of COVID-19 exposures at an ACT Public School, consideration will be given to whether any of the following additional COVID-19 Safety Measures should be temporarily reintroduced, with authorisation from the Education Directorate COVID Response Team. These measures aim to limit the potential for further transmission and will generally be limited to a short period of time (eg 1-2 weeks).

- **Additional testing recommendations -** such as to test before returning to school and again in 48 hours.
- **Masks -** Staff, students in years 7-12, and visitors may be asked to wear a mask when indoors and when physical distancing of 1.5 meters cannot be maintained.
- **Limiting parents and carers on site -** Parents and carers may be asked not to attend a school site without an appointment.
- **Cancelling permitted activities -** Any of the permitted activities outlined below, may be cancelled or rescheduled to another date.
- **Cohorting -** It *may be* necessary to cohort a particular class or year level so that they don't mix with other students or staff across the school.
- **Remote learning -** Some or all students may need to return to remote learning for short periods of time. This measure will be limited as much as possible, however may also be enacted in response to workforce shortages arising from COVID-19.

RAPID ANTIGEN TESTING

Rapid Antigen Tests (RATs) will continue to be available and provided on an as needed basis for all staff and students in ACT schools – government and non-government, for term 3. Participation in Rapid Antigen Testing is voluntary. RATs are available at schools for staff to take home for self-administering.

Positive test results are to be reported to the school in accordance with documented procedures, and staff are to comply with Public Health Directions regarding declaring test results and isolation requirements.

HOUSEHOLD CONTACTS

On 20 April 2022 the ACT Government endorsed ACT Health's recommendation to change the public health directions for COVID-19 household contact quarantine. As per this agreement, from 26 April 2022, household contacts are no longer required to quarantine provided they comply with certain requirements:

- Have no symptoms of COVID-19
- Wear a facemask in indoor settings. This applies to students in years 7-12
- Work and/or study from home where it is practicable to do so
- If seeking to attend work or study – where it is not practicable to do so from home – undertake RAT testing every 48 hours
- Test before entering an unavoidable indoor gathering
- Not enter a high-risk setting – which does not apply to education settings
- Minimise social contact and movement in the community

END OF YEAR SCHOOL EVENT PLANNING

The Directorate are currently reviewing the End of Year event guidelines to enable schools to adequately plan and prepare for such events. Events such as school formals, graduation ceremonies, end of year school assemblies etc _can_ be planned for but _may be subject to change_ depending on relevant Public Health advice and risk of exposure and transmission at the time of the event.

VULNERABLE EMPLOYEES

The Australian Health Protection Principal Committee is the decision making committee for Australian health emergencies and has provided criteria for people who are considered at higher risk during the COVID-19 pandemic. These people need to take additional steps to look after their health and safety during COVID-19. The following groups of people are identified as vulnerable employees in relation to COVID-19:

- Aboriginal and Torres Strait Islander people 50 years and older with one or more chronic medical conditions.
- People 65 years and older with a chronic medical condition
- People 70 years and older
- People with compromised immune systems
- People who are pregnant

Any employee who identifies in one or more of the vulnerability categories should discuss with their manager how risks are to be managed. Further information on managing vulnerable workers is available: Measures for vulnerable employees (sharepoint.com) For assistance in identifying suitable additional control measures to support a vulnerable employee, please contact whs.edu@act.gov.au or hrbp.edu@act.gov.au

MENTAL HEALTH AND WELLBEING

Having lived and worked through the pandemic for quite a while now, it is understandable that mental health, wellbeing and fatigue are fluctuating. Resources for managers/leaders and employees are available by contacting EIAW@act.gov.au and by visiting the Mental Health and Wellbeing During COVID-19 sharepoint site, ACT Employment Portal and the Employee Assistance Program provider, Converge International.

EMERGENCY PROCEDURES

If management of emergency procedures in your facility have changed in response to COVID, it is important that this is documented in the CSAP and is well communicated and understood by all people affected by the change. An example of a change may be where evacuation assembly locations are expanded to support the maintaining of cohorting during drills and emergency events. Consideration should be given to whether the emergency or evacuation response will be impacted by a reduction in staffing numbers due to staff absences.

RISK ASSESSMENT

The following risks and controls should be considered in the context of your school/college and added to your CSAP if relevant. **The below suggestions do not replace the risks and controls you have already noted in your CSAP, these are further suggestions to consider in the context of your setting.**

Identified hazard	Risk factor(s) What can happen and how it can happen?	Impact Outcome What would be the outcome or effect?	Controls used to reduce risks	Risk Rating (RR)			For consideration Can include further risk treatment strategies or a rationale behind no further action.	Risk Rating with additional controls in place			Monitor and Review Monitored by whom? Dates for review
				C	L	RR		C	L	RR	
New COVID-19 variants that are considered more contagious	- High transmission of COVID-19 in school communities	- Increase infection rates - Staff attendance impacted	- Maintain physical distancing when in indoor spaces - Highly recommend mask wearing indoors - Ventilation plans adhered to - Use of full PPE for staff who administer first aid or providing one on one support to any unwell student	3	3	M	- Monitor public health advice for new variants that may be introduced - Monitor ventilation plans - Mask wearing, where required				All staff
Poor mental health and fatigue	- Ongoing pandemic may cause individuals and/or groups to experience poor	- Poor metal health and increased fatigue impacting attendance at workplace	- Manager supervision of staff. - EIAW Wellbeing Officers conduct check-ins with identified staff. - Employee Assistance Program support.	2	4	M	- Two orientation programs established to support new & returning students				Classroom teachers, school leaders & student engagement team

Identified hazard	Risk factor(s)\n\nWhat can happen and how it can happen?	Impact Outcome\n\nWhat would be the outcome or effect?	Controls used to reduce risks	Risk Rating (RR)			For consideration\n\nCan include further risk treatment strategies or a rationale behind no further action.	Risk Rating with additional controls in place			Monitor and Review\n\nMonitored by whom?\nDates for review
				C	L	RR		C	L	RR	
	mental health and fatigue.	(absenteeism and presenteeism)	- Workforce Plans to support continuity of education services during periods of higher staff absenteeism				- Year cohort wellbeing session each fortnight.\n- Student can access Student Engagement Team – YSW, School Psych, Year Co etc.\n- Remind staff of the EAP details and have supervisors do regular check ins with staff.\n- Teaching staff and Executives will create lesson plans and have them readily available.				
Stress regarding high levels of community transmission.	- Staff concerned about risk of exposure to COVID-19 in the workplace during period of high community transmission.	- Absenteeism and presenteeism impacting continuity of education service delivery.	- Availability of Rapid Antigen Testing to assist in screening and reducing COVID positive\n\n- Ongoing communication of controls implemented to support safety.\n\n- Workforce Plans to support continuity of education services during periods of higher staff absenteeism	2	3	M	- RAT distribution Signage and frequently communicated messaging that workers, students, and others are not to attend the site if unwell.\n- Limiting non-essential visitors from site.\n- Strategic placement of hand sanitiser to promote timely and effective use.				**Monitored by the Senior Executive Team (SET) – weekly at SET meetings.**\n\n**SET will consult with HSR**

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				C	L	RR		C	L	RR	
							- Placement of signage to reinforce social distancing and hygiene requirements. - Face masks in use where required, with disposable and reusable masks changed every 4 hours. - Frequent cleaning of high touch areas. Disinfectant wipes located at shared use resources such as printers/photocopiers. - Adherence to biohazard waste removal practices for wipes & disposable masks.				
Changes to emergency plans.	- Absence of employees who hold an emergency control role. - Changes to procedures to maintain COVID Smart measures.	- Ineffective or impaired emergency response (evacuation, lockdown etc)	- Review emergency plans for required contingencies. - Communicate and practice changes made to procedures.	3	3	M	- Back up wardens for each area identified. - WH&S Officer has a back up support. - Changes to procedures will be communicated via email				**Monitored by the Senior Executive Team (SET) – weekly at SET meetings.** **SET will consult with HSR**

ACT Government Education

Identified hazard	Risk factor(s) What can happen and how it can happen?	Impact Outcome What would be the outcome or effect?	Controls used to reduce risks	Risk Rating (RR)			For consideration Can include further risk treatment strategies or a rationale behind no further action.	Risk Rating with additional controls in place			Monitor and Review Monitored by whom? Dates for review
				C	L	RR		C	L	RR	
Accuracy of Rapid Antigen Tests compromised by incorrect storage.	- RAT kits exposed to temperatures exceeding 30º C when stored at the school, during transport home and within the home.	- False negative test result leading to COVID positive staff or students attending the school.	- Suitable storage location and conditions identified at the school. - Information provided to staff and families about storage requirement to maintain below 30º C. - Alternate option provided for collection where students cannot safely transport RATs home.	3	3	M	- Ensure RATS are stored below 30º C - Remind families of the correct procedures for storing RATS				**Monitored by the Business Manager and Administration team**
Exposure to occupational violence and other unreasonable behaviours.	- Parents/carers frustrated by processes and restrictions in place at schools.	- Workers may experience distress and/or psychological injury/illness.	- Communications are clear to set expectations. - Unreasonable Parent Behaviour Policy. - Police assistance to be requested where necessary.	1	2	L	- Staff reminded of the Unreasonable Parent Behaviour Policy. - School community reminded of acceptable behaviour policy. - Clear processes in place to minimise staff exposure to OV				**Monitored by the Senior Executive Team (SET) – weekly at SET meetings.** **SET will consult with HSR**
Transmission of COVID across multiple year groups / cohorts	- Cohorting no longer a requirement under the Health Guidelines therefore a confirmed COVID positive case who attends school while infectious could transmit COVID.	- Multiple exposures across various cohorts / year groups - Significant staffing / resourcing impact due to absenteeism - Impact to school operations	- Maintain physical distancing when in indoor spaces - Minimise the length of time multiple year groups / cohorts are bought together. - Household contacts who are unable to work or study from home should follow all Health advice while at school including wearing a mask and maintaining physical distancing	3	3	M	- Clear messaging to families regarding processes for household contacts - Measures in place for staff and students that are at risk of contracting COVID.				**Monitored by the Senior Executive Team (SET) – weekly at SET meetings.** **SET will consult with HSR**

Risk matrix

					Consequences				
E: Extreme risk — detailed action plan required **H:** High risk — needs senior management attention **M:** Medium risk — specify management responsibility **L:** Low risk — manage by routine procedures *Note:* High or Extreme risks must be reported to senior management and require detailed treatment plans to reduce the risk to Low or Medium.				**WHS impact on people**	Injuries or ailments not requiring medical treatment	Minor injury or first aid treatment case	Serious injury causing hospitalisation or multiple medical treatment cases	Life threatening injury or multiple serious injuries causing hospitalisation	Death or multiple life-threatening injuries
					Insignificant	Minor	Moderate	Major	Catastrophic
	Probability	**Historical**			1	2	3	4	5
Likelihood	>1 in 10	Is expected to occur in most circumstances	5	Almost certain	M	H	H	E	E
	1 in 10–100	Will probably occur	4	Likely	M	M	H	H	E
	1 in 100–1,000	Might occur at some time in the future	3	Possible	L	M	M	H	E
	1 in 1,000–10,000	Could occur but doubtful	2	Unlikely	L	M	M	H	H
	1 in 10,000–100,000	May occur but only in exceptional circumstances	1	Rare	L	L	M	M	H

Source: Adapted from AS/NZS ISO 31000:2009 Risk Management, and Australian Capital Territory Insurance Authority (ACTIA) *Risk Management Toolkit*

NB: The Risk Matrix has been modified to reflect that in the context of health and safety any chance, even a rare occurrence, of a death or multiple life-threatening injury is considered extreme.