Pupil referral unit and alternative provision planning for September
This commentary and checklist aims to help those who work in and lead PRUs/AP to understand the DFE advice and the NEU’s concerns in planning for the autumn term. Use this in conjunction with the joint union checklist for schools which includes advice on more general issues. The term PRU is used throughout this checklist in reference to both pupil referral units and other alternative provision.

The checklist proposes questions for union reps to ask about different aspects of plans for PRUs in September with the overall aim of making them as safe as they can be. Risk assessment is at the very centre of our approach - this checklist is intended to assist with a thorough and wide-ranging risk assessment, not replace or substitute for one.

The DfE has not issued separate advice for PRU’s/Alternative Provision (AP). They include two paragraphs within the main advice for schools suggesting that AP settings may wish to adopt whole school bubbles. The NEU does not think that in most AP settings this will be a practical or safe option.

We know that most PRUs have remained open to the majority of their students throughout the coronavirus crisis and are likely to already have robust safety plans in place. As every student is expected back in school in September there may be a need for additional risk assessment of both the workplace and individual students and staff, including which bubble arrangements are safest and most practical for your setting.

Union reps should seek meetings with school leaders in order to discuss plans for full reopening. School leaders’ difficult responsibility will be assisted by comprehensive union input. Consultation must start as soon as possible and allow for improvements to be made to those. If unfortunately, there is either a failure to consult or members concerns are not being addressed, then this should be escalated.

Union reps should share this checklist (and their PRUs existing and proposed risk assessments if available) with members and invite them to comment formally and informally via zoom meetings or other means. Members should be updated on progress and remain fully involved.

The risk assessment process
(Refer to DFE advice section 1 “Public health advice to minimise COVID-19 risks” and Annex A)

The DFE advice notes that PRUs/AP must review and update their risk assessments to include the additional control measures needed for a return to full opening and put arrangements in place for monitoring and updating arrangements from September. Annex A of the DFE advice gives more detailed advice on the process.

▪ Will consideration have been taken of the need for additional preparation time for students in PRUs/AP to be ready for a full return?

▪ Has risk assessment been undertaken regarding protocols around positive handling/restraint of pupils?

▪ Is the PRU therefore planning for a phased, more flexible return of students (eg during the first half of the autumn term)?

▪ Has the process also included risk assessments for individual pupils identified as at greater risk?

▪ Has the process of risk assessment taken into account the wider catchment areas of many PRUs?
Risk assessments for children and young people with EHC plans

- Is there a plan in place to assess risk for every child with an EHC plan? Which staff will be involved in this process?
- Have staff/parents/pupil (if over 16 and appropriate) been consulted about plans for September?
- Have ‘bubbles’, equipment use, transport, personal care needs etc been taken into account in the risk assessment?
- Has the risk assessment of the school’s transport provider been seen and the school been consulted on it?

Temporary changes to send legislation

The DfE says that it will not be issuing further national notices to modify the EHC plan duties (modification of section 42 of the Children and Families Act 2014) beyond July 31st. There may be recourse, however, to ‘local flexibilities’ if there are further outbreaks of Covid 19 during the school year. The temporary changes to the law on EHC needs assessments and plans which relax the local authorities’ duties remain in place until 25 September 2020.

- Will all students be able to access any additional external support that they require to fully participate?
- Will central support team staff, therapy staff and peripatetic teachers be able to access the PRU and work with students safely? Does the PRU have a plan for how this is to be managed?
- Can the PRU provide PPE/face coverings/masks/sanitiser to all visiting professionals who need it?
- Will students be able to access any additional assessment required external to the school?

Protective measures

Cleaning hands

- Are skin friendly cleaning wipes available for children for whom hand washing would be problematic? (as advised by the DfE)
- Are satisfactory arrangements proposed for supervision and monitoring, including to assist young pupils and those with additional needs?

Ensuring good respiratory hygiene

- Has the school included the risks from the ‘airborne transmission of respiratory droplets’ for staff working with children who regularly spit?
- Will windows be kept open at all times to aid ventilation?
- Will doors be kept open where possible to aid ventilation? Has this been risk assessed in terms of students for whom leaving the door (or windows) open would not be safe?
- How will good hygiene for external visitors to the school be organised?

Wearing personal protective equipment (PPE) where appropriate

- Will appropriate PPE be provided for staff at significant risk, due to necessary close personal contact with pupils who can’t control behaviour such as spitting, coughing or sneezing or whose behaviour or learning needs to be physically managed?
- Will each staff member be risk assessed to ensure that the most appropriate mask or covering is sourced for their use? (eg hearing aid users cannot wear ties around the ears, BSL users or those who need children to see their mouth will need clear masks etc)
- Will all staff being entitled to more frequent breaks in order to change the PPE/face coverings eg between sessions, after working with individual children and to hydrate properly?
Social distancing
(Refer to DfE advice section 1 “Public health advice to minimise covid-19 risks”)

For PRUs the DfE recognises that social distancing is difficult and says it is acceptable for students not to distance within their bubble or group. They suggest consideration of whole PRU bubbles. In PRUs we know that many pupils will need the opportunity to leave their class and go to a quieter, or less sensory stimulating space at times during the day.

Grouping children
- Has the PRU considered the best way of creating bubbles for your setting? Eg linked to corridor, series of rooms or other geographical arrangements, rather than by year group or just one class, or whole school?
- Are these ‘bubble’ arrangements reasonable and sustainable?
- Are arrangements in place for pupils to safely access quiet spaces, sensory rooms during the school day? How will this be staffed given the need to maintain bubbles? How will these areas be cleaned between users?
- Will teachers working with students in a particular bubble remain separate from students in other bubbles at all times?
- Will support staff working with students in a particular bubble remain separate from students in other bubbles at all times?
- Will steps be taken to minimise the extent to which staff move between bubbles?

Measures within the classroom
- Given the number of students and staff in small classroom spaces in PRUs has risk assessment been undertaken to judge safe numbers and the realistic possibility of any distancing?
- Will children who are able to maintain distancing from staff and their peers be expected and supported to do so? Will other measures be adopted in the classroom to offer protection to staff in cases where children cannot be expected to maintain social distancing?
- Has your PRU identified quiet spaces for pupils who need them?
- Has your school identified how staff will manage pupils who need support with personal care (eg going to the toilet) in a way that maintains their dignity?
- Has your PRU identified ways in which key workers will remain with the students they support?

Measures for arriving at and leaving school
- Will there be staggered start and finish times to reduce contact between pupils?
- How will this be managed if many pupils travel to school on local authority transport?
- Will there be arrangements in place to prevent overcrowding at the gate and any other potential areas of overcrowding? How will overcrowding of transport staff at arrival/pick up time be managed?
- Will sufficient staff be on duty to monitor safe arrival and departure for each group of pupils, including to support pupils who need it (those with SEND/anxiety etc)?
- What arrangements will be in place for the safety of peripatetic staff, central support team staff (EPS etc) and supply teachers/staff?
**The school workforce**
(Refer to DFE advice section 2 “School operations”)

**Staff who are vulnerable or otherwise at increased risk**
- Has consideration been made about the additional risks associated with working in a PRU? (children who may be more vulnerable to contracting the infection and who can’t socially distance or control spitting etc)

**Support staff and visiting specialist staff; supply staff; and staff taking leave**
- Will the PRU conduct individual risk assessment with support staff who are working 1:1 with students?
- Will support staff be offered additional PPE/masks/face covering/gloves following risk assessment of the children they are working closely with, students who may be less able to socially distance/may spit etc?
- Will the school adopt a policy for continued employment for peripatetic and supply staff as necessary in order to ensure such staff are able to continue to support the school as needed?
- Will arrangements be in place to ensure that supply and peripatetic staff are informed about and supported with regard to safety measures when in school?

**School operations**
(Refer to DFE advice section 2 “School operations”)

**Dedicated PRU transport**
- Will satisfactory arrangements be made for distancing in seating plans (and in particular will it be possible to group pupils on transport according to their groups when in school)?
- Will arrangements be made for additional transport to be provided allowing for fewer students to have to use each bus/taxi, for example (and also to not need to remain travelling for as long)?
- Will arrangements be made for drivers and escorts to wear face coverings?
- Will protocols be put in place for drivers/escorts to report to a member of staff any child who they deem to be unwell on the journey to school? Will this include isolation of other students on that transport and the driver and escort?
- Will drivers/escorts be instructed not to pick up students displaying symptoms?
- What transport and safety arrangements for staff/driver/escorts are in place for when children show symptoms and have to use school transport to return home?
- Will satisfactory arrangements be made for supervision of boarding & disembarking including using sanitiser when boarding & disembarking and for complying with seating plans?
- Will arrangements be made for additional cleaning of vehicles?
- Will pupils aged 11 be required to wear face coverings on dedicated school transport as well as on public transport?
- What will be the protocol and action if young people refuse to wear face coverings when required to do so?
Student attendance
- Will a flexible approach to mandatory attendance be adopted based on “working towards full attendance” and recognising the differing circumstances of families and pupils?
- Will arrangements be in place to support families of Black students, students with SEND and others who may have increased concerns about resuming full attendance particularly in areas where deaths from Covid were high?

Educational visits
- Will risk assessment take place on other sites used by the PRU students eg farms, work experience? Can these sites be made Covid-secure?

Education provision
(Refer to DFE advice section 3 “Curriculum, behaviour and pastoral support” and section 4 “Assessment and accountability”)

Curriculum expectations
- Have staff been consulted on changes to the curriculum aimed at ‘recovery’ that is relevant and responsive to children and communities, that uses approaches and content from the previous year’s curriculum, additional time provided for staff to ensure new activities can be thoroughly (and collaboratively?) planned?
- Does your school timetable include sufficient / increased time for pastoral and mental health support for pupils, physical activity, creative subjects and space for dialogue and sustained thinking?

Behaviour and pastoral issues
- Does the timetable include sufficient/ increased time or additional arrangements for social and emotional support for students? Have pastoral systems been reviewed to support students to make healthy transitions and continue to engage with their learning?
- Has your schools Behaviour Policy been amended to reflect the trauma and distress many young people will have experienced, with appropriate staff training and support for different/temporary ways of working?

Assessment and accountability
- Has the school made provision for ways in which pupils will be able to ‘catch up’ on practical work required for pupil courses and exams (eg vocational qualifications)?
- Has the school agreed not to link pay progression to pupil progress in 2020/21?
- Will staff be consulted on new, innovative ways of working to build on lessons learnt and use of technology during the lockdown?