

## School COVID-19 Risk Assessment for full opening in September 2021– Guidance for all schools

With reference to the relevant sector guidance documents published by the Government for the full opening of schools, the following additional advice on carrying out risk assessments is provided.

Schools should revisit and update their existing COVID-19 risk assessments, to consider the additional risks and control measures to enable a return to full capacity in the autumn term. It is not suggested that schools “start again” as many aspects of the existing risk assessment will still be relevant and need to be part of their arrangements for September. When making changes to that document, it is recommended that they are clearly identified (e.g. a different font colour or otherwise highlighted) to make it obvious what has been changed. **The September 2021 changes will be in orange.**

Schools must ensure that arrangements are in place to work closely with parents, staff and unions, as they normally would, when agreeing the best approaches for their circumstances and then share the updated risk assessment with those concerned.

### Guidance for schools

Within the Government guidance documents are essential “*System of controls: protective measures*” that schools must confirm are in place within their current risk assessment and that each area is being reviewed in the light of any lessons learned and the changes to admissions in September. The required actions for prevention and in response to any infection are listed in the following tables with further details provided in the Government’s guidance for the full opening of schools. To assist schools, some “Points to consider” are provided as prompts and schools are invited to use these where appropriate to their circumstances.

Schools can use the following tables as templates or incorporate the text into their existing documentation in the best way for them.

## System of controls

### Prevention:

	Action	Points to consider	School use
1	<p>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</p>	<ul style="list-style-type: none"> <li>• Is the existing isolation room going to be appropriate or does a new room / additional rooms need to be identified?</li> <li>• Are there sufficient staff identified and trained to look after pupils waiting for collection?</li> <li>• Is there suitable and sufficient PPE available and appropriate disposal arrangements in place?</li> <li>• Are the cleaning arrangements for the room(s) adequate?</li> </ul> <p style="text-align: center;">• <b>Contingency for Outbreak Is in place for September 2021.</b></p> <p style="text-align: center;">Please see Outbreak document attached to the end of this Risk Assessment.</p> <p style="text-align: center;">Please see detailed COVID summary at the end of this risk assessment for scenarios including outbreak management.</p>	<p>Symptoms of COVID-19 are</p> <ul style="list-style-type: none"> <li>• A new and continuous cough ( coughing a lot for more than one hour)</li> <li>• A high temperature</li> <li>• A loss or change to sense of taste/smell</li> </ul> <p style="text-align: center;">A member of SLT must be informed if a child has symptoms.</p> <p>First aid room is the isolation room. SLT trained on procedure. Mask must be worn. Gloves and apron will be needed if contact is necessary.</p> <p>It has PPE available and a toilet. There is a regular cleaning schedule.</p> <p>Unwell children can have their temperature taken (thermo scanner in school ) and parents contacted while waiting to leave school premises. This should all be dealt with in a discreet manner so as not to cause alarm. If a child is sent home with symptoms- the area where they were working will be thoroughly cleaned.</p> <p>Children sent home with symptoms will be expected to be tested and isolate at home for at least 10 days. Any siblings will also be sent home. If test is negative – they can return when symptoms have gone. If a child has a positive test we will ensure the child and siblings stay at home for 10 days and are well enough to come back to school. Monitor for further cases.</p> <p>If there are more than 5 cases within the school in a 10 day period – we will work with the ‘protection team’ immediately.</p>

2	Clean hands thoroughly more often than usual	<ul style="list-style-type: none"> <li>• Are there sufficient stocks of soap, paper towels and/or hand sanitiser available in all required locations?</li> <li>• Is there sufficient bulk storage capacity for these items?</li> <li>• Are the storage facilities for waste paper towels sufficient and secure (arson prevention and hygiene) prior to removal from site?</li> <li>• Are there sufficient wash basins available?</li> <li>• Is additional provision required for children who need assistance with hand washing / sanitising?</li> <li>• Are there adequate facilities for members of staff to wash their hands particularly where they work with children with complex needs?</li> </ul>	<p>New sinks have been installed where needed. Hand washing routines are set in place. Washing stations for outside areas requested for lunchtimes. Stocks of paper towels and soap have been requested.</p> <p>Handwashing should take place on arrival at school, before lunchtime and before home time. Other normal hand hygiene as necessary.</p> <p>There are no more 'bubbles' across the school, but those members of staff who work with different year groups should practise good hand hygiene.</p>
3	Ensure good respiratory hygiene by promoting the 'catch it, bin it, kill it' approach	<ul style="list-style-type: none"> <li>• Are there sufficient stocks of tissues and disposal bins available for all classrooms?</li> <li>• Is there sufficient bulk storage capacity for tissues?</li> <li>• Are the storage facilities for waste tissues sufficient and secure (arson prevention and hygiene) prior to removal from site?</li> <li>• Is additional provision required for children who need assistance with respiratory hygiene?</li> </ul>	<p>Designated area for disposal of tissues in each classroom.</p> <p>School will provide tissues.</p> <p>Speak to children about the 'catch it, bin it, kill it' approach.</p>
4	Introduce enhanced cleaning, including cleaning frequently touched surfaces often, using standard products such as detergents and bleach	<ul style="list-style-type: none"> <li>• Are sufficient stocks of suitable cleaning products available and securely stored?</li> <li>• Have the COSHH requirements of the cleaning products been checked, especially bleach-based ones?</li> </ul>	<p>AMEY following their own new cleaning regime with cleaning materials stocked and managed by them.</p> <p>Each classroom will be cleaned at the end of the day with a focus on key touch points.</p> <p>Each room to have a spray provided to do incidental cleaning during the day should a child sneeze, cough etc on tables.</p>

		<ul style="list-style-type: none"> <li>Is there sufficient capacity within the cleaning team to do the enhanced cleaning tasks required throughout the school?</li> </ul>	<p>Shared classrooms should still be wiped down between year groups.</p> <p>Laptops should also be wiped down between year groups.</p>
5	Minimise contact between individuals and maintain social distancing wherever possible	<p>There is no longer a requirement for bubbles and strict social distancing in schools.</p> <ul style="list-style-type: none"> <li>Keep occupied spaces well ventilated.</li> </ul>	<p>Classrooms should have windows open to ensure good ventilation.</p> <p>Face coverings are no longer mandatory. It is acceptable for staff to wear one between areas of the school if they wish.</p>
6	Where necessary, wear appropriate personal protective equipment (PPE)	<ul style="list-style-type: none"> <li>Are there sufficient stocks available in the locations it is likely to be needed?</li> <li>Have all members of staff been given instruction on how to safely put on, take off and dispose of PPE?</li> </ul>	<p>Full PPE no longer necessary for first aid provision unless the child has symptoms.</p> <p>Normal requirement for gloves with a blood injury etc.</p> <p>A mask should still be worn for administering insulin to diabetic children until latest training is complete in September.</p>

#### Response to any infection:

	Action	Points to consider	School use
7	Engage with the NHS Test and Trace process	<ul style="list-style-type: none"> <li>Is the process understood and members of staff know what is required of them?</li> <li>Have parents/carers been informed of what they need to do?</li> <li>Is there suitable storage available for a small number of home testing kits?</li> <li>Asymptomatic Testing</li> </ul>	<p>The school expects parents to take their child for testing if they display symptoms. The school will follow up with these families to ensure the correct procedures have been followed.</p> <p>Staff Members now have LFD test kits at home to carry out asymptomatic testing on Saturdays and Tuesdays. Test results are logged with NHS and ParentMail form to the Headteacher.</p>
8	Manage confirmed cases of coronavirus (COVID-19) amongst the school community	<ul style="list-style-type: none"> <li>Has the school got the contact details for the local health protection team?</li> </ul>	<p>Children and staff affected by a positive case will follow the guidance of the DfE.</p>

		<ul style="list-style-type: none"> <li>• Does the school have a procedure to follow if they are contacted by the local health protection team?</li> <li>• What is the contingency plan for an outbreak in school?</li> </ul>	<p>The Contingency Plan states that until a threshold of <b>5 children, pupils, students or staff, who are likely to have mixed closely, test positive for COVID-19 within a 10 day period</b> – there is no need to contact the DfE for advice.</p> <p>Those positive cases will stay at home with their household and all other children will stay at school. Double vaccinated adults will also not need to isolate.</p> <p>If the threshold is met – guidance will be sought and the contingency plan followed. Please see Plan at the end of this document.</p>
9	Contain any outbreak by following local health protection team advice	<ul style="list-style-type: none"> <li>• Have the principles of this been included within the wider contingency plans?</li> </ul>	School will follow guidance and advice offered.

In addition, schools need to consider additional items that may not have been included within their original risk assessment or may be an increased factor for September onwards. Further details on each subject are provided in the Government’s guidance for the full opening of schools but to assist schools, some “Points to consider” are provided as prompts and schools are invited to use these where appropriate to their circumstances. Where an external provider of a service is involved, discuss with them how any changes to existing arrangements will be met using the principles set out in the Prevention table above.

Subject	Points to consider	School use
Transport to and from school	<ul style="list-style-type: none"> <li>• How will this affect/be affected by staggered start and finish times (impact on siblings, transport availability/timetable, etc.)?</li> <li>• Overview of school transport considerations by multiple year groups</li> </ul>	<p>Designated drop off and pick up areas are in place for families.</p> <p>School opens at 8.40 for all except the Nursery.</p> <p>Children straight to classes – no lining up outside.</p> <p>Masks and hand sanitising will continue and be reviewed at the end of September.</p>

Catering (provision of hot meals)	<ul style="list-style-type: none"> <li>• Where meals are produced in an external “Pod” or similar, can the food be taken to the serving point without coming into contact with other people?</li> </ul>	Normal cleaning practice can resume for the dinner halls.
Learning outside the classroom (day trips, etc.)	<ul style="list-style-type: none"> <li>• Has the guidance provided by the <a href="#">Outdoor Education Advisers Panel</a> been referred to?</li> <li>• Have Educational Visit Coordinator’s qualifications lapsed and need renewing?</li> </ul>	Outdoor learning to be encouraged where possible.
Additional Support Arrangements	<ul style="list-style-type: none"> <li>• Planning should be made for children who usually spend some of their week accessing external provision such as alternative provision or SEND provision.</li> <li>• Consideration should be given to the risk assessments of any provisions that are commissioned such as external Alternative Provision.</li> <li>• Consideration should be given to where children in school would be sent for support or discipline, e.g. sending to a safe space to support a child or sending them to the ‘inclusion unit’, etc.</li> <li>• Trainee Teachers on School Experience.</li> </ul>	Visitors to the school will follow normal procedures of signing in and out at the school office. No face masks required.
Extra-curricular provision (breakfast / after school clubs, etc.)	<ul style="list-style-type: none"> <li>• How will these impact on the cleaning schedule, especially any after school clubs?</li> </ul>	Wrap around care to be provided according to availability of spaces for families.
Curriculum expectations	<ul style="list-style-type: none"> <li>• If a child/class must isolate due to a positive case – what provision will be made for learning?</li> <li>• After School Activities.</li> <li>• Gaps in Learning. Where are they and how will they be addressed?</li> </ul>	<p>Online learning will commence immediately and provide the children with activities that mirror what is being offered at school. Paper Packs will be provided to those children that cannot easily access Seesaw.</p> <p>On their return, children’s mental health and learning will be assessed for gaps and new opportunities for ‘catch up’ learning will be planned for. Interventions and teacher led sessions.</p>

Physical activity (including use of external coaches)	<ul style="list-style-type: none"> <li>The guidance by the <a href="#">Association for Physical Education</a> (AfPE) links to their more general guidance on Physical Education, School Sport and Physical Activity which has been adopted by NCC for many years.</li> </ul>	Physical activity will be a priority for all. Daily slots to be allocated to mindfulness/movement/wellbeing. Visiting coaches will follow school guidelines.
First aid provision	<ul style="list-style-type: none"> <li>Have qualifications for First Aid at Work, Emergency First Aid at Work or Paediatric First Aid lapsed? (the validity of these qualifications has been extended but the deadline for requalification is 30th September 2020)</li> </ul>	Office has details of all up to date First Aiders. Additional members of staff to be trained from September. Lyn B to manage first aid at breaktimes and lunchtimes and some afternoons. Mornings will be covered by class teachers.
Contingency planning for outbreaks	<ul style="list-style-type: none"> <li>Refer to <a href="#">Northamptonshire COVID-19 Outbreak Prevention and Control Plan</a></li> <li>School will work with local team if two or more cases appear in the school.</li> </ul>	<ul style="list-style-type: none"> <li>Refer to <a href="#">Northamptonshire COVID-19 Outbreak Prevention and Control Plan</a></li> </ul>
Encouraging School Attendance	<ul style="list-style-type: none"> <li>School attendance will be mandatory for all pupils from 8 March.</li> <li>How will we reassure parents who are reluctant to send their children to school?</li> <li>What</li> </ul>	<ul style="list-style-type: none"> <li>Continue to communicate clearly and consistently the expectations around school attendance to families and any other professionals who work with the family where appropriate.</li> </ul>

*Questions asked that have not been added into the risk assessment:*

### **Will we still wear lanyards?**

Yes. They are part of what we wear day to day. Children do not touch them. Most of us will be within the same bubble all day. They could be wiped down at the end of the day if needed.

### **Reception corridor.**

This corridor should not be used as a short cut through to the staff room. The risk assessment addresses this in a general in terms of short cuts. The staff room toilet is in the Reception bubble and will be cleaned regularly and staff should return directly to the staff room.

### **Sick Children**

If a child is sick (not COVID related) the office should be informed and the child kept in their area until the office calls to say the parent has arrived.

### **Photocopiers**

There are plans to move one of the photocopiers to the staff room.

### **First Aid Toilet/ Forest School Toilet**

This toilet can be used as an incidental toilet for:

- Years 3/4 during Nurture lessons
- Reception during lunchtime **while eating**
- Forest School

The toilet will be cleaned by AMEY during break time and at the end of the day. It is for incidental use. **Hands must be sanitised on the way in and out of this toilet.** Children to be monitored for strict hand washing afterwards. Children should use their own Year Group toilets where at all possible.

### **Lunchtime Clubs**

There is a plan for lunchtime clubs to resume in a different format. Perhaps on a Year Group basis to avoid crossing over children. Planning is still in progress. KS1 Lunchtime club may be on an every other week basis. Year 1/ Year 2.

### **Fruit in KS1**

Fruit bowls to go into each classroom and handed to the children to reduce cross contamination.

### **Kitchen Staff in KS1 Hall**

Use the sink to fill the bucket for cleaning at the beginning of lunchtime. The first aid room will be in use throughout lunchtime.

### **Before and After School Clubs**

Clubs run in the morning will allow the children to enter the hall as and when they arrive with parents. No need to queue. Just drop off and leave the site as soon as possible. Plan for phases to be escorted to Zig Zag by members of that phase. Plan to follow.

### **Late Children**

If children are late to the office in the morning, they must be signed in and sent to their classroom if in KS2.

KS1 children can be escorted to their area and delivered through the following doors without entering the building.

- Reception main door near Jemima Puddleduck
- Year 1 door near Scarecrow
- Year 2 main door near Mr.Fox.

If children's parents are late to collect them. They must stay in their pick up area until collected. If more than 10 minutes- contact a member of SLT to take over if necessary.

### **Office Questions**

The school toilet should only be used by staff. If on occasion it needs to be used by a parent – it would be allowed but discouraged. When visiting the office - please be mindful of the distance and space in the room.

### **Fire Drill**

Make sure that the laminated fire drill register is updated daily.

New meeting points to be practised in September. On Thursday 3<sup>rd</sup> take class on a walk to show fire points. Full drill on Friday.

Nursery – By the mini court in Middle Area

Reception – In the football markings on KS1 Playground

Year 1 – Middle of KS1 Playground

Year 2 – Near equipment on KS1 Playground

Year 3 – By the hopscotch in Middle Area

Year 4 - Green Area

Year 5 - By the bushes on KS2 Playground

Year 6 – By the shed on KS2 Playground

Mobile/ Middle Room etc to be taken to their classes. Being mindful of other children moving towards their evacuation points.

Risk Assessment for School Cloud check ins during CoVid-19

	<b>Action</b>	<b>Points to consider</b>	<b>School use</b>
	Child teacher check in	Safeguarding of child	<p>Teacher to consider</p> <ul style="list-style-type: none"> <li>• whether child is kept during the meeting</li> <li>• whether the parent is available during the meeting</li> <li>• the general attitude towards the work set</li> <li>• the general atmosphere in the room</li> </ul> <p>If there is anything that causes concerns add to MY Concern under the CoVid check in bar.</p>
		Safeguarding of Teacher in school	<p>School to consider</p> <ul style="list-style-type: none"> <li>• all meetings unless exceptional circumstances to take place on school property</li> <li>• all meetings to be logged through School Cloud</li> <li>• all meetings to take place on school devices</li> <li>• all meetings to take place in the presence of the parent</li> <li>• meetings where there are historical concerns about the child and the parents to be overseen by SLT</li> </ul>
		Additional points for the Safeguarding of Teachers working from home	<p>School to consider</p> <ul style="list-style-type: none"> <li>• any meeting that takes place where the teacher is self-isolating to be attended by a member of SLT in addition to the teacher.</li> <li>• all meetings to be attended in business dress with a plain background</li> </ul>

**A summary of the main changes and expectations in our Risk Assessment  
Boothville Primary School  
September 2021**

**Please keep this somewhere safe for your reference.**

- Masks are no longer mandatory but can be worn in communal areas if you are more comfortable doing so.
- We will no longer operate in separate bubbles. Continue to wipe down surfaces between year groups if sharing the same area daily. Laptops etc should still be wiped down.
- Staff room is open to all. Continue to wipe down surfaces and keep areas clean.
- Hand hygiene to continue. On arrival, before lunch and at the end of the day.
- Promote 'catch it, bin it, kill it' for sneezes etc.
- If there are more than 5 cases within the school within proximity to each other – we will put our Contingency Plan into action.

COVID19 symptoms are:

\*a new continuous cough

\*a high temperature

\*a loss of, or change in, your normal sense of taste or smell (anosmia)

**A child or adult displays symptoms in school**

Children with symptoms to be taken to the medical room as before. A member of SLT **must** be informed. Staff member with the child must wear a mask. Gloves and apron to be worn if contact with the child is necessary. Parent to collect and take the child to be tested. Office staff to let SLT know of anyone sent home.

If a child is sent home with symptoms we would ask the adults who were in direct contact to carry out LF test daily until the child's result is back. The adults can come to school as normal. All children can stay at school as normal.

If child is negative – they can return to school as normal. Adults at school can resume testing twice a week as normal.

If a child is positive – they must stay at home and isolate for 10 days. Direct contact staff and pupils will be notified. Staff may choose to have a PCR test and stay away from school until the result is known. Parents of direct contact children will have the same option. They may also choose to Lateral Flow test every day for 10 days and come to school. If a positive LF test is received they would then have to go for a PCR test and wait at home until the result is known.

If a staff member displays symptoms they should stay away from school or leave school and go for a PCR test.

### **A child or adult tests positive**

If over the weekend, we hear that someone has tested positive, they must stay at home and isolate for 10 days. Direct contact staff and pupils will be notified. Staff may choose to have a PCR test and stay away from school until the result is known. Parents of direct contact children will have the same option. They may also choose to Lateral Flow test every day for 10 days and come to school. If a positive LF test is received they would then have to go for a PCR test and wait at home until the result is known.

### **Outbreak Contingency Plan**

Our Contingency Plan states that if a threshold **of 5 children, pupils, students or staff, who are likely to have mixed closely, test positive for COVID-19 within a 10 day period** is reached, we will then revert to previous measures such as face coverings and bubbles if necessary. Please see separate plan for details.

### **NHS Guidance on how to isolate**

#### **When to self-isolate and what to do**

It's a legal requirement to self-isolate if you are told to by NHS Test and Trace. You could be fined if you do not self-isolate.

#### **When to self-isolate**

Self-isolate straight away and get a [PCR test \(a test that is sent to the lab\) on GOV.UK](#) as soon as possible if you have any of these 3 symptoms of COVID-19, even if they are mild:

- \*a high temperature
- \*a new, continuous cough
- \*a loss or change to your sense of smell or taste

You should also self-isolate straight away if:

- \*you've tested positive for COVID-19 – this means you have the virus
- \*someone you live with has symptoms or tested positive (unless you are not required to self-isolate – check below if this applies to you)
- \*you've been told to self-isolate following contact with someone who tested positive – [find out what to do if you're told to self-isolate by NHS Test and Trace or the NHS COVID-19 app](#)

### **When you do not need to self-isolate**

If someone you live with has symptoms of COVID-19, or has tested positive for COVID-19, you will not need to self-isolate if any of the following apply:

- \*you're fully vaccinated – this means 14 days have passed since your final dose of a COVID-19 vaccine given by the NHS
- \*you're under 18 years, 6 months old
- \*you're taking part or have taken part in a COVID-19 vaccine trial
- \*you're not able to get vaccinated for medical reasons

Even if you do not have symptoms, you should still:

- \*get a [PCR test on GOV.UK](#) to check if you have COVID-19
- follow advice on [how to avoid catching and spreading COVID-19](#)
- \*consider limiting contact with [people who are at higher risk from COVID-19](#)

### **Tell people you've been in close contact with that you have symptoms**

Tell people you've been in close contact with in the past 48 hours that you might have COVID-19.

You should tell them to follow advice on [how to avoid catching and spreading COVID-19](#).

They do not need to self-isolate unless they're contacted by the NHS Test and Trace service.

If they get any symptoms of COVID-19, they should self-isolate and get a test as soon as possible.

### **How to self-isolate**

You must not leave your home if you are self-isolating.

- \*do not go to work, school or public places – work from home if you can
- \*do not go on public transport or use taxis
- \*do not go out to get food and medicine – order it online or by phone, or ask someone to bring it to your home
- \*do not have visitors in your home, including friends and family – except for people providing essential care
- \*do not go out to exercise – exercise at home or in your garden, if you have one

### **How long to self-isolate**

If you test positive, your self-isolation period includes the day your symptoms started (or the day you had the test, if you did not have symptoms) and the next 10 full days.

You may need to self-isolate for longer if you get symptoms while self-isolating or your symptoms do not go away.

# Boothville Primary School

## COVID-19

### Outbreak Management Plan

#### September 2021

### Introduction

This plan is based on the [contingency framework for managing local outbreaks](#) of COVID-19 and the [schools operational guidance from step 4](#), provided by the Department for Education (DfE).

We will only implement some, or all, of the measures in this plan in response to recommendations provided by our local authority (LA), director of public health (DsPH), Public Health England (PHE) health protection team or the national government.

It may be necessary to implement these measures in the following circumstances, for example:

- To help manage a COVID-19 outbreak within the school
- If COVID-19 infection rates in the community are extremely high, and other measures have failed to reduce transmission
- As part of a package of measures responding to a 'variant of concern' (VoC)

The thresholds, detailed below, can be used by settings as an indication for when to seek public health advice if they are concerned. For most education and childcare settings, whichever of these thresholds is reached first:

- 5 children, pupils, students or staff, who are likely to have mixed closely, test positive for COVID-19 within a 10-day period;
- or
- 10% of children, pupils, students or staff who are likely to have mixed closely test positive for COVID-19 within a 10-day period

## Shielding

We will adhere to national guidance on the reintroduction of shielding, which would apply to those on the [shielded patient list \(SPL\)](#).

We will speak to individuals required to shield about additional protective measures in school or arrangements for home working or learning.

## Other measures

If recommended, we will limit:

- Residential educational visits
- Open days
- Transition or taster days
- Parents coming into school
- Live performances

If recommended, we will reintroduce:

- Bubbles, to reduce mixing between groups
- Face coverings in communal areas and classrooms for staff and visitors (unless exempt)

## Attendance restrictions

Attendance restrictions will only be recommended as a last resort. If recommended, we will implement the measures in this section.

### a) Eligibility to remain in school

In the first instance, we will stay open for:

- Vulnerable pupils
- Children of critical workers
- Reception, Year 1 and Year 2 pupils Discuss

If further restrictions are recommended, we will stay open for:

- Vulnerable pupils
- Children of critical workers

## **b) Education and support for pupils at home**

All other pupils will be required to stay at home and will receive remote education.

We will aim to deliver remote education that meets the same quality and quantity of education that pupils would receive in school, as outlined in our remote learning policy.

The school will continue to provide meals or lunch parcels or vouchers for pupils eligible for benefits-related free school meals while they are not attending school because of COVID-19 isolation guidelines.

## **c) Wraparound care**

We will limit access to before and after-school activities and wraparound care during term time and the summer holidays to those that need it most.

We will communicate who will be eligible to attend once the restrictions are confirmed.

## **d) Safeguarding**

We will review our child protection policy to make sure it reflects the local restrictions and remains effective.

We will aim to have a trained DSL or deputy DSL on site wherever possible.