

ATC Language Schools

COVID RESPONSE PLAN

ATC Language Schools, 2020

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CORONAVIRUS

The World Health Organisation (WHO) has characterised the outbreak as an international health emergency. In line with Government and public health advice we have developed policies and procedures to protect our employees, our students, visitors and our various partners.

POLICY STATEMENT

It is the company's intention that its work will be carried out in accordance with all the relevant statutory provisions of the Safety, Health & Welfare at Work Act 2005, and the Safety Health & Welfare at Work (General Application) Regulations 2007. As well as adhering to the government return to work protocol, in ensuring that all reasonably practicable measures will be taken to avoid risk to its employees or others who may be affected by the running of the business.

ATC Language Schools policies aim to measure, manage and control proactively in terms of a safe working and learning environment. Our policies are designed to ensure all employees and students act proactively in ensuring the health and safety of all linked with ATC Language Schools.

ATC Language Schools will take all necessary and appropriate measures to fulfil our duty of care and protect the health of our employees and students. The Safety, Health and Welfare at Work Act 2005 places a general duty of care on employers to ensure, so far as is reasonably practicable, the safety, health and welfare at work of employees. Duties include the provision of facilities, arrangements, information and instruction for the welfare of employees at work. Employees also have obligations under this Act to ensure that they do not pose a threat to the safety of others in their workplace. Employees are obliged, by law to safeguard themselves and work colleagues by complying with regulations set out in the Health, Safety and Welfare Act 2005.

All workplaces operating during the Covid-19 pandemic need to ensure they are protecting their workforce and minimising the risk of spread of infection. Our response plan is intended to introduce consistent measures in line with the Government's recommendations.

The health and safety requirements of ATC Language Schools will not be compromised at this time. If an activity cannot be undertaken safely due to a lack of suitably qualified personnel being available or social distancing being implemented, it will not take place.

ATC Language Schools commits to:

1. Closely monitoring local conditions and developments along with national and international news as the coronavirus situation continues to evolve.

2. Making sure employees are aware of company policies, protocol and practices that apply to our workplaces.
3. Continuing to provide a safe place and system of work, and ensuring that common work areas are clean and cleaned regularly and that clean hand washing facilities are available.
4. Issuing regular instructions concerning hygiene in the workplace. Employees are responsible for maintaining good personal and respiratory hygiene, such as washing your hands with soap, avoiding touching your mouth, nose and eyes, disinfecting their workstation, and so on.

COVID-19 SYMPTOMS

It is the responsibility of all employees to be aware of what the Covid-19 symptoms are and to be mindful if they develop these symptoms. It can take up to 14 days for symptoms of Covid-19 to appear.

The most common symptoms of COVID-19 are:

- a persistent cough - this can be any kind of cough, not just dry and lasting more than 4 days;
- shortness of breath;
- breathing difficulties;
- fever (high temperature).

HOW IS COVID-19 TRANSMITTED

Covid-19 is transmitted through both droplet transmission and contact transmission.

Droplet transmission is the transmission through moisture carrying bacteria and when infected droplets come into contact with the nose, mouth and eyes.

Contact transmission is the transmission through direct or indirect contact.

Direct contact- Direct contact with an infected person, ie a handshake

Indirect contact – Contact from a contaminated surface. Coronavirus can live up to 72 hours on surfaces.

Individuals can get the virus if they come into close contact with someone who has the virus and is coughing or sneezing, through touching surfaces that someone who has the virus has coughed or sneezed on.

Spread is most likely from those who have symptoms. To infect someone, the virus has to get from an infected person's nose or mouth into another person's eyes, nose or mouth.

Keeping this in mind will help you to remember all the things you need to do to protect yourself and others from the virus.

PREVENTION

ATC Language Schools have implemented various changes across all buildings to assist with the prevention of spreading Coronavirus.

We ask that all employees, students and visitors:

- Wash hands well and often to avoid contamination;
- Cover their mouth and nose with a tissue or sleeve when coughing or sneezing and discard of used tissue;
- Avoid touching eyes, nose, or mouth with unwashed hands;
- Clean and disinfect frequently touched objects and surfaces;
- Wear face coverings in common areas (reception, canteen, hallways, toilets and classrooms)

For the most up-to-date and correct information and advice visit www.hse.ie or www.gov.ie/health-covid-19.

HSE GUIDANCE

If you HAVE symptoms:

- Stay away from other people;
- Phone your Medical Practitioner without delay;
- If you do not have a Medical Practitioner phone 112 or 999;
- You will need to be tested for COVID-19 if you have symptoms and have in the last 14 days been:
 - (a) in close contact with a confirmed case of COVID-19,
 - (b) to a place where there is spread of COVID-19.

Your Medical Practitioner may also suggest you are tested for COVID-19 if you have a severe lung infection. If your Medical Practitioner thinks that you need a test for COVID-19, they will tell you where the test will be done. They will also tell you when to expect your results.

HSE GUIDANCE VULNERABLE WORKERS

HSE advice is to protect yourself and other from the coronavirus. Some people fall under the vulnerable category during the Covid-19 pandemic.

WHO IS A VULNERABLE WORKER?

While the concept of vulnerable worker is used within the protocol, the term is not defined. At present, responsibility for setting the parameters of this category will rest with employers themselves.

At a minimum, however, a “vulnerable worker” could be understood to include the categories of very high risk individuals identified by the HSE (who were advised to cocoon) and categories of high risk individuals identified by the HSE. The full list of these categories of individuals is available on the HSE

website, however, at a high level, these categories are based on age, disability and medical conditions.

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Vulnerable workers during the pandemic include:

- over 70
- have a long-term medical condition like heart disease, lung disease, diabetes, cancer or high blood pressure
- Pregnant
- Have severe respiratory conditions

When Should Employers Consider Vulnerable Workers?

Employees who fall under the vulnerable category should speak to their GP to seek advice on returning to the workplace. ATC Language Schools may request a confirmation letter from your GP for your return to work.

ATC Language Schools will enable vulnerable workers to work from home where possible. If a vulnerable worker cannot work from home and must be in the workplace, ATC will ensure the vulnerable workers are preferentially supported to maintain a physical distance of two metres.

ATC Management request employees discuss with their manager returning to work safely.

EMPLOYEE WITH PRE-EXISTING MEDICAL CONDITIONS

The HSE has outlined that persons with certain pre-existing medical conditions may be at higher risk of serious illness from COVID-19. These are listed as cardiovascular disease, diabetes, chronic respiratory disease and cancer.

If any employee considers themselves to be at risk, they should seek medical advice as to what steps should be taken.

Employees with pre-existing medical conditions may consult with their manager on possible mitigation measures that may be put in place as deemed practicable.

SITE INFECTION PREVENTION & CONTROL MEASURES

Transmission is the passing of communicable disease from one infected host to another. Hosts are people, animals, plants and microorganisms. Corona is a large group of viruses which can infect both humans and animals with cold related diseases. The intensity ranges from common colds to acute respiratory syndrome.

It is essential for employees to adapt themselves to procedures that help prevent the spread of the disease. All company policies and procedures are available on HR Locker and are required to be signed by all employees. Employees will make themselves aware of Covid-19 symptoms and monitor their wellbeing.

Hand Hygiene

- Information posters are available throughout the buildings on proper hand hygiene, proper respiratory hygiene and how to identify symptoms
- Hand sanitiser stations located throughout all buildings
- No handshake policy
- Own stationery policy

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- Own cutlery, cup and plate/bowl policy

Sneeze Guards

Sneeze guards are available where 2 meters social distancing is not available. Sneeze guards are located for protection of both employees and students.

Contact Tracing

It is the responsibility of ATC Language Schools to assist with contact tracing. All visitors to the workplace will be required to complete a visitor declaration form at least 48 hours before their appointment. This will allow ATC to contact them in case of an isolated outbreak within the premises.

All employees are responsible for maintaining a record themselves of who they have been in contact with for 15 minutes or longer. This is only required for working hours.

Employees have been provided with a template that we request employees complete at the end of the day and scan and upload to a secure file on the server.

Teachers will complete this document only when they meet an individual outside of their bubble.

This document is only for when employees are in contact for 15 minutes or longer and not adhering to social distancing of 2 metres.

ATC urge employees to consider downloading the government tracing app.

Workplace Compliance Officer

The Workplace Compliance Officer is responsible for ensuring the workplace observes and follows the regulations pertaining to the prevention and control of Covid-19. It is the responsibility of the Workplace Compliance Officer to identify threats and take proactive measures to control them.

The main responsibilities of the Workplace Compliance Officer are:

- Ensuring social distancing is adhered to and intervene when social distancing is not being adhered to
- Monitor day to day activities
- Ensure hygiene and safety in the workplace
- Stay up to date on Covid-19 control measures through effective training
- Prepare and maintain a record of Covid-19 control measures
- Preparing, maintaining and executing a framework of action including the compliance duties of all in the workplace
- Monitor signage
- Educate employees on prevention and control. Educate on personal hygiene
- Monitor the cleaning process
- Ensure availability of sanitisers and hand washing facilities
- Report non adherence to the appropriate regulation

The Workplace Compliance Officer is shared between the Human Resources & Quality Assurance Manager (Joanne Mitten) and the Facilities Manager (Christina Moore).

VISITORS

ATC Language Schools have designed and will communicate reasonable and prudent protocols around visitors to the workplace based on up-to-date government and medical advice. ATC Language Schools aim to minimise the quantity of visitors to our workplaces. Please familiarise yourself with our Visitor Policy.

- Visitors will be required to complete the visitor declaration form at least 48 hours before their appointment. The purpose of this is to assist with contact tracing if a localised Covid-19 outbreak occurs in the workplace;
- Visitors will be required to provide personal data to the receptionist to assist with contact tracing;
- Visitors will be required to follow signage through buildings and adhere to one way systems in place;
- Employees are requested to schedule visitors. Only one visitor at a time and visits to be kept to a maximum of 45 minutes;
- Follow the no handshake policy.

All visitors are requested to wear face coverings on the premises of ATC Language Schools. If visitors refuse to wear face coverings, they will be refused entry into the buildings.

EMPLOYEE RESPONSIBILITIES

1. Stay at home and do not come to the workplace if you are feeling ill or have a common cold/fever or similar so you do not affect your colleagues.
2. Retain proper hand hygiene, wash your hands properly and often.
3. Retain proper respiratory hygiene, cover your mouth and nose with a tissue or your sleeve when you cough and sneeze. Put used tissues into a bin and wash your hands.
4. Clean and disinfect frequently touched objects and surfaces.
5. Avoid close contact with people who are unwell.
6. Follow travel advice from the Department of Foreign Affairs.
7. Wear masks in common areas (reception, hallways, toilets, canteen and classrooms)

WHAT TO DO IF YOU FEEL UNWELL

Check, do you have symptoms of coronavirus. These are:

- A cough (persistent and more than 4 days)
- Shortness of breath
- Breathing difficulties
- A fever (temperature of 38c or higher)

If you have any of the above symptoms:

- Do not go to work
- Do not go to your GP or Emergency Department. Phone them first
- If you do not have a GP, phone 112 or 999

- Tell them of your symptoms and provide details on your situation (do you live alone, are there vulnerable people in your house)
- Avoid contact with other people by self-isolating.

PROCEDURE FOR SUSPECTED CASE IN THE WORKPLACE

If an employee develops a high temperature or a persistent cough while at work, they should:

1. Inform their manager immediately. If your manager is unavailable, please inform a senior manager;
2. Do not touch any surfaces to the best of your ability;
3. Cough, sneeze into your elbow;
4. Your manager will provide you with a face mask;
5. You will be brought to our isolation room and your temperature will be taken. You will be asked what rooms and facilities you were in/used that day;
6. You will be asked if you can contact your own GP. If you can you are required to seek advice from your GP. If you are too sick to contact your own GP, a member of ATC Language Schools will seek advice from a local GP;
7. ATC Language Schools will provide you with transport either home or to an A&E. You should not attempt to drive if you are very unwell and you are not to use public transport to avoid spreading the virus.

If an employee becomes extremely unwell within a short timeframe in the workplace, the employee is to inform their line manager immediately. The line manager is to follow the following steps:

1. If an employee comes to you with Covid-19 Symptoms, you are required to provide the employee with a face mask and yourself with a face mask and escort them to the isolation room and take their temperature. Also request what rooms they were in that day and also what facilities they used;
2. Ask the employee if they can contact their GP for medical advice. If they are unable you are to contact a local GP for medical advice. You are seeking advice on whether the employee is to return home or go to hospital;
3. Once confirmed you are to organise a taxi for the employee. The employee is not to take public transport home nor drive home if they are very unwell;
4. A deep clean is required, please inform the Facilities Manager to organise.

Anyone who meets one of the following criteria should not come to work:

- Has a high temperature or a new persistent cough - follow the guidance on self-isolation
- Is a vulnerable person (by virtue of their age, underlying health condition, clinical condition or are pregnant)
- Is living with someone in self-isolation or a vulnerable person

MEDICAL EXAMINATION

ATC Language Schools reserves the right to have employees medically examined. If an examination is justified, particularly if the employee was in an affected high risk zone, an employee cannot reasonably refuse to be medically examined.

If an employee refuses to participate in a medical examination, this will be dealt with formally and if necessary, through the disciplinary procedure, as this requirement is designed to ensure the health and safety of you and your colleagues.

PHYSICAL DISTANCING

In accordance with HSE and government guidance, physical distancing must be a core factor for employees returning to work.

ATC Language Schools have implemented the following regulations to promote physical distancing throughout our buildings:

- Organised work spaces/ classroom spaces to maximise social distancing;
- Organise workers into small teams that take breaks at the same time;
- Stagger canteen use, and arrange facilities and procedures to maximise social distancing during breaks;
- Stagger class start times and break times;
- Using remote means for meetings where possible and minimising attendance of face to face meetings if they are absolutely necessary;
- Providing one-way systems where practicable;
- Banning hand-shaking

Where it is not possible to maintain the recommended two metres of social distancing, ATC Language Schools have implemented:

- Physical clear plastic barriers;
- Request employees to maintain a distance of at least one metre, or as much is reasonably practicable;
- Provide face masks for employees;
- Ensure clean hand washing facilities, hand sanitisers and disinfectant wipes for work stations

BUILDING REGULATIONS/ CONTROL MEASURES

HAND WASHING FACILITIES

Hand washing facilities are available throughout the building, with a supply of water and hand soap. Information posters on hand hygiene are located beside each hand washing facility.

Employees are responsible for hand hygiene and keeping their hands clean. Hands are recognised as a major cause of spreading contamination and infection to ourselves and to others.

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Washing your hands is one of the simplest yet effective ways to stop the spread of germs.

HOW TO WASH YOUR HANDS

- Wet your hands with clean running water (hot or cold). Turn off tap and apply soap.
- Lather your hands by rubbing them together with soap. Be sure to lather upper and bottom of hands, between fingers and under your nails. You should spend between 15-20 seconds washing your hands.
- Rinse under clean running water (hot or cold) and dry with a clean towel.

Fingertips and thumbs are the most frequently missed areas when washing hands.

Key times to wash your hands:

- Before work, when entering a building
- Before putting disposable gloves on
- After toilet
- Before any task
- Before eating
- Every 15-20 minutes

HAND SANITISERS

Following advice from the government, where hand washing facilities are not available, ATC Language Schools have installed hand sanitisers in all classrooms and at entrances and exits and common areas.

INFORMATION POSTERS

Information posters on hand hygiene, respiratory hygiene and symptoms of Covid-19 are displayed throughout all buildings.

ONE-WAY SYSTEM

Where physically possible and practical, a one-way system is implemented to assist with physical distancing. Notices and floor stickers are available.

RISK ASSESSMENTS

Risk assessments have been carried out throughout the building for employees, students and visitors. Control measures have been put in place based off these assessments.

EMPLOYEE PPE

ATC will provide PPE for employees with suspected Covid-19 symptoms and in isolation. PPE is based on the hazard of the worker and it is the responsibility of ATC Language Schools to provide PPE to employees in accordance to their exposure. Employees who will be provided with PPE will be provided with training on the proper use, cleaning, storing and disposal of PPE.

Teachers will be provided with visors and administrative staff will be provided with reusable cotton masks. Visors will also be available for administrative staff who have direct contact with students/group leaders.

CLEANING & DISINFECTION

Cleaning will be conducted on regular intervals on frequently touched surfaces such as table tops, work equipment, door handles, handrails, toilets and taps.

To prevent infection and cross contamination all cleaning material is colour coded and separated.

Employees will be provided with cleaning materials to maintain the cleanliness of their own workstation. Before employees use other desks, or hot desks, we request they clean all equipment and desk space before commencing work. There will be a significant reduction in the use of hot desks within the company.

Disinfection wipes and sprays are available in contact points such as photocopiers and we request all employees after use to wipe down machines.

SICK LEAVE

If a student or employee contracts COVID-19, and those in close contact must self-isolate, working from home will be implemented for those close contacts where possible.

If you must self-isolate based on HSE advice you do not have to work and you should apply for the Enhanced Illness Benefit*.

If you need to stay at home due to non-COVID related illness, the normal sick policy stated in your contract will apply throughout this time.

The above guidelines are developed in accordance with current legislation. We expect that legislation around this area will change and we will adapt to these changes and continue to adhere to current legislation.

*Certified self-isolation: If you must self-isolate based on advice from your GP or Public Health worker, please note you do not have to work. This absence should be certified and you should apply for the enhanced Illness Benefit of €305 from the Department of Employment Affairs and Social Protection.

Covid-19 Diagnosis: If you are diagnosed with Covid-19, you do not have to work. This absence is certified and you should apply for the enhanced Illness Benefit of €305 from the Department of Employment Affairs and Social Protection.

Public transport curtailment: Finally, if further restrictions are introduced, public transport may be curtailed or come to a standstill. If this happens and you are therefore no longer able to perform your work, your absences are excused, but you will not be entitled to continued payment of wages from ATC Language Schools.

REMOTE WORKING PLANS

If the work premises must close completely or if someone needs to self-isolate, ATC Language Schools can facilitate remote working in most cases, in line with business requirements. Please revert to ATC Language Schools Remote Working Policy.

DATA PROTECTION

During the course of your employment, you may become aware of medical information relating to the infection of Covid-19 in customers/ clients/ work colleagues/ contractors/ sub-contractors/ employees of clients/ suppliers / delivery drivers and so on. Please note that such information is protected – it is high risk and classified as a special category of health data under the Data Protection Acts 1988–2018 and the General Data Protection Regulations.

Employees are explicitly forbidden from screenshotting, recording, sharing and forwarding or otherwise of any such information, relating to the person’s medical condition, which was gathered during your employment. This relates to text messaging, email, Viber, WhatsApp and social media forums such as Facebook, Facebook Messenger, LinkedIn, Twitter, Snapchat, Instagram, Tiktok etc.

ATC Language Schools take our GDPR obligations extremely seriously. We will have to instigate an investigation for any such breach, with sanctions for proven instances up to and including dismissal.

In addition, such an action would be classified as a data breach, which would need to be reported to the Data Protection Commissioners Office. If you need to report a data breach, please notify your Data Protection Officer.

RIGHT TO PRIVACY

Coronavirus was recently officially designated as a “notifiable disease”, which means doctors must immediately notify the HSE when a case of COVID-19 is diagnosed. ATC Language Schools will carefully assess an employee’s privacy rights when considering whether or not to notify other employees about ill co-workers.

In exceptional cases, we may permit disclosure if there is a real risk of other employees becoming infected. In these unique circumstances, it would be reasonable for ATC Language Schools to override the privacy concerns of an affected employee to ensure that the health and safety of the wider workforce is maintained.