

Coronavirus  
**COVID-19**  
Public Health  
Advice

# COVID-19 RESPONSE PLAN

## English Language Education (ELE) Sector

*This document provides guidance on the steps and processes to be in place across English Language Teaching Organisations (ELTOs) to effectively and efficiently respond to COVID-19 in these settings, including prevention measures, and procedures for responding to suspected and confirmed cases of COVID-19 on site.*

*Please note, HPSC case definitions and guidance in relation to COVID-19 are subject to change. Please see HPSC website (<https://www.hpsc.ie/>) for up to date information.*

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# Introduction

The government's [Resilience and Recovery 2020-2021: Plan for Living with COVID-19](#), [COVID-19 Resilience and Recovery: The Path Ahead](#), combined with the [Work Safely Protocols](#), a collaborative effort by the Health and Safety Authority (HSA), the Health Services Executive (HSE) and the Department of Health, and ongoing Public Health advice, provide the overarching framework for all sectors of society to reopen facilities and premises.

For further and higher education, the government has also published [Guidance for Further and Higher Education for returning to on site activity in 2020: Roadmap and COVID-19 Adaptation Framework](#) accompanied by [Implementation Guidelines for Public Health Measures in Higher Education Institutions \(HEIs\)](#).

In addition, the ELE sector here has developed a comprehensive ELTO COVID-19 compliance checklist which details a list of specific best-practice protocols that all ELTOs are asked to follow.

The above guidance provides robust advice to English Language Teaching Organisations (ELTOs) on COVID-19 prevention measures, implementation of which will minimise the risk of infection for all students and staff. ELTOs should adapt and customise these recommendations for their own particular settings, adhering at all times to the overarching Public Health principles on which the guidance is predicated.

This document clearly outlines the steps to be taken should there be a suspected case of COVID-19 on site and subsequent procedures to facilitate HSE Public Health management of confirmed cases or outbreaks as required.

The objectives of this guidance are:

- To put in place protocols and structures to facilitate timely assistance of HSE Public Health in case of confirmed cases and to provide for a rapid response to outbreaks aligned with best public health practice. **NB:** A Public Health Risk Assessment is not required for all confirmed cases of COVID-19 with links to an ELE setting. **If information gathered by the HSE during a case investigation suggests a need for HSE Public Health input, then HSE Public Health will contact the institution directly to discuss further action, including Public Health Risk Assessment.**
- To be sector led, so that the complexity of ELTOs on the ground is reflected in the approach.
- To ensure consistency of approaches across all ELTOs.
- To ensure that the systems developed are shared across all ELTOs.
- To provide a coherent national approach, based on overarching Public Health principles, that can facilitate further action by ELTOs where appropriate.
- All communications, including protocols, must be used as an opportunity to reinforce public health advice regarding prevention e.g. through making practices such as physical distancing, hand hygiene, respiratory hygiene, environmental hygiene and face covering the norm on site. Communications must continually reinforce the message that students and staff should not attend school if symptomatic for COVID-19. Students and staff should be empowered to rapidly disclose if they develop symptoms of COVID-19 on site and there should be procedures/protocols in place for immediate isolation of such individuals, and advice on further actions.

It is endeavoured that this COVID-19 Response Plan is finalised in consultation with the HSE's Health Protection Surveillance Centre (HPSC) and in liaison with the Department of Further, Higher Education, Research, Innovation & Science, the Department of Health, and ELE associations, and staff representatives.

The priority for ELTOs is to ensure the health and safety of staff and students, while offering students a rich and meaningful learning experience. Speaking English is a vital ability in a globalised world as it opens many doors of opportunity that may otherwise remain closed. International students seeking opportunities to further their careers in the job market or to gain access to university require a sufficiently high level of English. Therefore, access to English language education is a critical opportunity in the life of international students; it is a transformational and empowering skill. It should be a priority that, while living with COVID-19, ELE training at all levels can continue. It is recognised that face-to-face engagement is an essential component of effective language learning, especially for those students with no prior experience of language education, and students who require particular support, who risk being marginalised or disadvantaged without the support of the ELTO community. It is a fundamental principle that ELTOs will operate in accordance with public health guidance. The specific features and context of ELTOs require that operationalisation of the overarching public health guidance is facilitated through context-specific guidance and measures that acknowledge and address the unique features of the sector.

Considerable work has already been completed across ELTOs in preparation for the return to face-to-face teaching in the ELTOs. All students and members of staff will be requested to follow current Government and ELE sector-wide guidelines at all times.

The ELE sector in Ireland teaches approximately 150,000 students a year, across approximately 100 ELTOs, in which 3000 full-time staff and 7000 seasonal staff are employed. Educational facilities not only provide for the educational needs of students, but also many of their holistic, health and pastoral needs.

ELTOs and their international students are an important component of many local communities. ELTOs support a range of ancillary services in the travel and tourism sectors and work with an estimated 30,000 host families around the country. It is crucial that all staff and students follow national public health advice, within and outside the ELE setting, and carefully consider their activities in order to minimise opportunities for COVID-19 transmission. Lower rates of COVID-19 in the community reduce the likelihood of a significant number of cases and outbreaks in the ELE setting.

## Background - Managing the Risk of COVID-19 in ELE settings

COVID-19 is an infectious disease caused by the SARS-CoV-2 virus first detected in December 2019 in Wuhan, China. Infection is understood to be mainly transmitted via respiratory droplets generated by breathing, sneezing and coughing, as well as via direct contact with an infected person, or indirect contact, through hand-mediated transfer of the virus from contaminated surface/objects (fomites) to the mouth, nose, or eyes.

The virus cannot multiply outside of a living host but can survive on various surfaces for a period of hours or days (depending on the conditions) if these surfaces are not appropriately cleaned. It is not yet clear how long such viral residue is capable of infecting someone.

Important prevention measures to mitigate risk of COVID-19 transmission include:

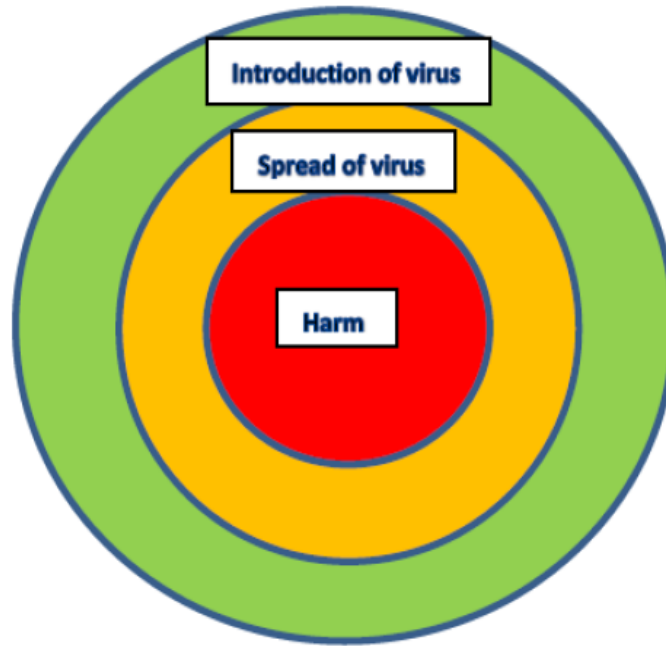
- People with symptoms of COVID-19 should immediately self-isolate and phone for medical review.
- Close contacts of confirmed cases should follow public health advice as directed (e.g. [restriction of movements](#) for 14 days from last contact with the confirmed case, testing at day 0 and day 7 etc.)
- Physical / social distancing
- Hand hygiene
- Respiratory hygiene
- Wearing face coverings
- Avoiding congregation

Each ELTO's COVID-19 Response Plan needs to be supported by effective Public Health messaging, including messaging around the potential for severe illness and long-term sequelae in younger adults. Preventive measures, including physical/social distancing, frequent hand washing and disinfecting, good respiratory hygiene and correct use of face coverings should be facilitated and strongly reinforced to prevent the spread of COVID-19 in ELE settings.

Managing the risk of spread of COVID-19 on a higher education campus has been described in the "[Implementation Guidelines for Public Health Measures in Higher Education Institutions \(HEIs\)](#)" as three concentric circles. In an ELE setting these are:

1. Minimising the risk of introduction of infection into ELTOs.
2. Minimising the risk of spread of the virus in ELTOs if it is introduced.
3. Minimising the associated harm if introduction and spread in ELTOs does occur

**Figure 1. Concentric circles of Managing the risk of spread of COVID-19**



Source: [Implementation Guidelines for Public Health Measures in Higher Education Institutions \(HEIs\)](#), p. 5.

# COVID-19 Response Plan

With COVID-19 circulating in the community, it is inevitable that cases will occur amongst students and staff attending, or working within, ELTOs.

In such circumstances, the COVID-19 Response Plan must ensure:

- Full compliance with all action requested by HSE Public Health, who undertake case and outbreak investigation and management under current Infectious Disease legislation. E.g. ELTOs can support the Public Health risk assessment undertaken by HSE Public Health which will guide outbreak control measures.
- ELTOs prepare systems to ensure confirmed cases of COVID-19 are urgently followed up in collaboration with HSE Public Health Department
- Development of systems and procedures for recording and retaining attendance and contact information for students/staff on site as appropriate (e.g. names and up to date, accurate contact details for students and staff)<sup>1</sup>.
- Development of communications and instructions to encourage students and staff to download the COVID-19 Tracker App<sup>2</sup> to assist in recording their close contacts on a daily basis.
- ELTOs prepare systems to facilitate HSE Public Health communications on site.
- Provision of a dedicated space for isolation of suspected cases of COVID-19 and facilities to support students or staff members in self-isolation.
- Preparedness for facilitation of testing of suspected cases, including on site testing if appropriate and in close consultation with HSE Public Health – on site testing may comprise pop-up testing centres operated by the HSE/National Ambulance Service (NAS) if required to test large numbers of contacts.

The COVID-19 Response Plan described below elaborates on the [Implementation Guidelines for Public Health Measures in Higher Education Institutions \(HEIs\)](#) and the [Implementation Guidelines for Public Health Measures in ETB Further Education and Training Institutions \(FET\)](#). Specifically, it focuses on:

1. Protection from and prevention of COVID-19
2. ELE COVID-19 Outbreak Response Team
3. Management and investigation of suspected cases of COVID-19 on site
4. Confirmation of Cases and Contact Tracing
5. Public Health Risk Assessment (PHRA)
6. Public Health Principles and Outbreak Control

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<sup>1</sup> In keeping with GDPR and confidentiality requirements.

<sup>2</sup> <https://COVIDtracker.ie/>

# 1. Protection from and prevention of COVID-19

Guidance for the re-opening of ELTOs has been provided via the ELTO COVID-19 Compliance Checklist and associated policy documents and the various government publications referenced in the introduction. An ELE Internal COVID-19 Management and Outbreak Response Team works collaboratively to manage the implementation of the COVID-19 safety guidance and to monitor compliance to prevent the spread of COVID-19.

The need for a clear COVID-19 communication plan for staff and students is of paramount importance.

## Clear Communication Plan for Staff and Students

ELTOs should have a comprehensive and ongoing communication plan that covers the following:

1. Raising and maintaining awareness amongst all members of the ELTO community in relation to the symptoms of COVID-19, how the disease spreads and how spread can be prevented on site and off-site.
2. Clearly communicating relevant pre-arrival information to prospective students with regards to government guidelines, restriction of movements, safe accommodation arrangements, the [COVID-19 Resilience and Recovery: The Path Ahead](#) and current status of the student's destination county, etc.<sup>3</sup>
3. Clearly communicating relevant pre-arrival information to current students with regards to government guidelines, restriction of movements, safe accommodation arrangements, the [COVID-19 Resilience and Recovery: The Path Ahead](#) and current status of the student's destination county, etc.<sup>4</sup>
4. Clearly communicate the obligation of completing a COVID-19 Self-Declaration Form for all staff and students before returning to the ELTO.<sup>5</sup>
5. Communicating translated COVID-19 and Health & Safety information to students<sup>6</sup>.
6. Clearly communicating any structural changes to work-place routines that result as a consequence of COVID-19 prevention measures, e.g. staggered timetables, 'work pods'<sup>7</sup>, etc.
7. Clearly displaying facilities plan detailing access points, one way systems (if possible), exit points, individual room capacities, sanitations points, queuing areas, isolation rooms, offices, and further available facilities.
8. Clearly communicating with all staff and students what they should do if they develop symptoms of COVID-19 on site or elsewhere, i.e. immediately self-isolate and seek medical review (contact GP by telephone). Staff/students should be registered with a GP and access testing through their GP. Where someone is not yet registered with a GP, they can contact any GP by phone to arrange a test.
9. Clearly communicating with all staff and students that they should not attend school if they have symptoms of COVID-19 and re-affirm this messaging on an ongoing basis.

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<sup>3</sup> See also *ELE Ireland Advisory to Prospective Students*

<sup>4</sup> See also *ELE Ireland Advisory to Students already in the State*

<sup>5</sup> HSA template:

[https://www.hsa.ie/eng/topics/COVID-19/return\\_to\\_work\\_safely\\_templates\\_checklists\\_and\\_posters/return\\_to\\_work\\_form.pdf](https://www.hsa.ie/eng/topics/COVID-19/return_to_work_safely_templates_checklists_and_posters/return_to_work_form.pdf)

<sup>6</sup> Translated information can be found on the HSE website:

<https://www.hse.ie/eng/services/news/newsfeatures/COVID19-updates/partner-resources/COVID-19-translated-resources/>  
<https://www.hse.ie/eng/about/who/primarycare/socialinclusion/intercultural-health/COVID-19-sharing-resources-migrant-health.html>

<sup>7</sup> The objective is to limit contact and sharing of common facilities between people in different classes as much as possible. The aim within an ELTO is that students only mix within a 'pod' from arrival at the ELTO in the morning until departure at the end of the classes. Smaller ELTOs may only have one 'pod'.



10. Guidance for staff and students on how to access testing, including arranging transport where appropriate. Confirmed cases of COVID-19 are notified to HSE Public Health under current Infectious Disease legislation. If a student/staff member tests positive for COVID-19 they will be contacted by HSE Public Health and advised regarding further action. Patient confidentiality is the cornerstone of all clinical interactions. Contact tracing will be undertaken and if there is a risk of transmission then those at risk will be contacted by the HSE. If an [outbreak of COVID-19](#)<sup>8</sup> in an ELTO is suspected, HSE Public Health will undertake a risk assessment and act appropriately to protect the health of students and staff.
11. Guidance for staff and students on what to do if they receive a positive result, importance of informing the ELTO, support available to students and staff, and where isolation facilities are located on the ELTO site.

Notes:

- The distinction between [self-isolation](#) and [restricted movements](#) should be clearly understood<sup>9</sup>.
- If ELTOs have under-18s on site, the above communication plan should be tailored to account for these students. Where appropriate, specific guidance and protocols should be in place for students who are under 18 years of age. Please refer to section 13 of the ELTO COVID-19 Compliance Checklist.

## 2. ELE COVID-19 Management and Outbreak Response Team

### 24-hour Rapid Response System

#### Features of the Structures

The governance structures for responding to outbreaks of COVID-19 on site in liaison with HSE Public Health Department should have the following features.

It is imperative that all stakeholders understand that the investigation and management of all cases/outbreaks of notifiable infectious diseases, including COVID-19, are the legislative responsibility of the Medical Officer of Health (HSE Public Health) (Appendix 1). If necessary, HSE Public Health may convene an Outbreak Control Team (different from ELTO internal Outbreak Response Team as described below).

1. An HSE National Outbreaks Oversight Group for outbreaks in ELTOs, if deemed necessary.
2. An ELE COVID-19 Management and Outbreak Coordinator to lead ELE Management and Outbreak Response Team on site.
3. An ELE COVID-19 Management and Outbreak Response Team of named individuals.
4. A dedicated ELTO contact (individual or group on a rotating basis) who is available to HSE Public Health, students and ELE colleagues as appropriate, 24/7.

A sample table of roles & responsibilities in responding to a confirmed case of COVID-19 on site is provided in Appendix 2. This should be adapted as appropriate.

<sup>8</sup> COVID-19 outbreak case definition:

- A cluster/outbreak, with two or more cases of laboratory confirmed COVID-19 infection regardless of symptom status. This includes cases with symptoms and cases who are asymptomatic.  
OR
- A cluster/outbreak, with one laboratory confirmed case of COVID-19, and at least one additional case of illness with symptoms consistent with COVID-19 infection (as per the COVID-19 case definition)

<sup>9</sup> The difference between self-isolating and restricted movements:

<https://www2.hse.ie/conditions/coronavirus/managing-coronavirus-at-home/self-isolating-and-restricting-movements-differences.html>

### 1) ELE COVID-19 Management and Outbreak Coordinator – responsibilities

- Designated contact person for regional HSE Department of Public Health to facilitate timely communications and Public Health actions as required.
- Provide high-level oversight of implementation of COVID-19 Plan and Public Health measures on site, including prevention measures and maintenance of appropriate attendance records/ records of students and staff.
- Lead ELE Internal COVID-19 Management and Outbreak Response Team on site. This will be the ELTO Director/Centre Manager/Health and Safety Officer.

### 2) ELE Internal COVID-19 Management and Outbreak Response Team – responsibilities

- Act as on-going liaison with the HSE, as appropriate.
- Assist HSE Public Health in outbreak management / control as required, e.g. provide information to facilitate contact tracing (e.g. attendance records; lists of students living in school accommodation etc.); assisting with communications; implementation of additional / enhanced preventive measures etc.
- Development of and oversight of implementation and monitoring of COVID-19 Plan and Public Health measures on site.
- Comprised of ELTO Owner/Director, ELTO Operations Manager/Health & Safety Officer, ELTO Manager Nominees, ELTO Academic Manager, Lead Worker Representative(s)

### 3) Dedicated ELTO contact – responsibilities

- ELE nominated individual (or group on a rotating basis) who is available to HSE Public Health, and ELE colleagues and students as appropriate, 24/7.
- Note: Health queries should be directed via HSELive as per usual protocols.

The Department of Public Health can be contacted via HSELive on 1850 24 1850<sup>10</sup>.

## **3. Management and investigation of suspected cases of COVID-19 on site**

If a student/staff member develops symptoms of COVID-19 clear protocols should be in place in line with national [HSPC Guidance](#):

Students and staff members should immediately self-isolate and arrange medical review by contacting their GP by telephone. If possible and appropriate (e.g. if their symptoms are mild, they are systemically well and they have their own vehicle or private transfer can be arranged to not use public transport), they should go home<sup>11</sup> to self-isolate and telephone their GP. However, pre-identified COVID-19 isolation spaces should be available on site, with good ventilation and preferably a window that opens to the outside.

Students and staff members who develop symptoms suggestive of COVID-19 infection, e.g. fever OR a new cough, OR shortness of breath, deterioration of existing respiratory condition OR loss of or change in sense of taste or smell *should not ignore those symptoms, or delay seeking medical advice, and must take the following action:*

- if they are at home, stay at home, self-isolate, and contact their GP by telephone.
- if they are away from home, return home by the safest means possible (avoid public

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<sup>10</sup> <https://www.hse.ie/eng/services/list/5/publichealth/publichealthdepts/contact/phoffices.html>

<sup>11</sup> For students, “home” refers to their current accommodation

transport if possible), self-isolate and contact their GP by telephone.

- if they are on the ELTO site they should immediately go home, self-isolate, and contact their GP by telephone.
- if unable to travel home promptly, they should follow the ELTO's protocol to access the pre-identified COVID-19 isolation spaces on site, self-isolate there, and seek medical advice by telephone. ELTOs should ensure students are guided to the isolation room in as safe a manner as possible to minimise risk of onward transmission. ELTOs should arrange private transfer to go home or for further medical examination/testing.

ELTOs will ensure that:

- appropriate isolation spaces are available and accessible, with good ventilation, preferably an open window to the outside;
- the protocol to access and use the isolation spaces is widely disseminated and understood by all members of the ELTO's community;
- the isolation space is appropriately supported, with medical and safety advice readily available.

The GP or medical adviser will assess and advise as per normal clinical practice and refer for testing if required and as outlined in HSE adult assessment and testing guidance. Testing is advised for any adult who meets the [case definition for COVID-19](#), or other testing criteria (e.g. close contact of a confirmed case of COVID-19), unless there is a strong clinical reason to do otherwise.

COVID-19 test results are confidential as per doctor/patient confidentiality. However, students and staff members should be advised that current legislation empowers HSE Public Health doctors to use data as required for the purposes of protecting public health, e.g. to protect people from infection under defined circumstances. Therefore, a positive COVID-19 test result for a named individual (student/staff member) may need to be disclosed to the ELTO for the purposes of contact tracing/outbreak management. Only the minimum details necessary for the purposes of contact tracing/outbreak management are shared with an agreed dedicated senior member of staff in the ELTO, such that appropriate HSE Public Health action can be undertaken.

Information should be widely available on the location and contact details of general practitioners/medical advisors, student health centres, isolation facilities, test centres, and how to access transportation to these locations, as appropriate.

Clear messages on associated costs for students should be provided (GP review and testing via the HSE is free of charge at point of care).

Mass testing of students or staff is not recommended under the current national testing strategy. ELTOs should not implement mass testing of students/staff unless advised to do so by the HSE.

## **Test Results - COVID-19 “not detected” result**

### **Person with symptoms of COVID-19**

If a symptomatic individual (who is NOT a close contact of a confirmed case of COVID-19) has a COVID-19 'not detected' result, they should restrict their movements (including not attending the ELTO) until they are symptom free for 48 hours. They may have a different illness, with similar symptoms to COVID-19, and they should follow their doctor's advice on further investigation or treatment as required.

### **Person with no symptoms of COVID-19 who was tested because they are a close contact of a confirmed case**

Close contacts of confirmed cases of COVID-19 should follow HSE Public Health advice, which currently advises restricted movements (including not attending the ELTO) for 14 days after most recent contact with a confirmed case. Close contacts of confirmed cases will be offered COVID-19 testing under current national guidelines. Even if their test result is reported as COVID-19 'not detected', they must still continue to restrict their movements (including not attending the ELTO) for 14 days after their most recent contact with a confirmed case. This is because it can take up to 14 days for COVID-19 to develop, and a 'not detected' test result does not guarantee that a close contact will not develop COVID-19 at some stage over the 14-day period.

**NB:** In the event of a large number of suspected cases who will be referred for testing across ELTOs, it is important to await contact/direction from HSE Public Health before taking further action, e.g. activating the ELE COVID-19 Response team. This is necessary to prevent any misunderstanding and imposition of unnecessary restrictions of movement.

## **4. Confirmation of Cases and Contact Tracing**

In the event that a student or staff member of an ELTO tests positive for COVID-19, the HSE will contact the individual directly, as per usual protocols, to inform them of the positive result and advise regarding further action. The majority of the ELE community are adults and will be tested and treated for COVID-19 according to adult protocols. If a student is under 18, parental consent should be in place as per the ELE Ireland Under-18s Guidance Protocols. See also section 13 of the ELTO COVID-19 Compliance Checklist. **NB:** An Public Health Risk Assessment is not required for all confirmed cases of COVID-19 with links to an ELE setting. **If information gathered by the HSE during case investigation suggests a need for HSE Public Health input, then HSE Public Health will contact the ELTO directly to discuss further action, include Public Health Risk Assessment. The Department of Public Health can be contacted via HSELive on 1850 24 1850<sup>12</sup>.**

There is an obligation on a student/staff member who tests positive for COVID-19 positive, or shares a household with a confirmed case, to inform the ELTO as soon as possible. ELTOs should have a 24-hour contact email mechanism in place for staff and learners so prompt action can be taken when the ELTO opens the following morning. Students and staff members should be advised that current legislation empowers Public Health doctors to use data as required for the purposes of protecting public health, e.g. to protect people from infection under defined circumstances. Therefore, a positive COVID-19 test result for a named individual (student/staff member) may need to be disclosed to the ELTO for the purposes of contact tracing/outbreak management. Only the minimum details necessary for the purposes of contact tracing/outbreak management are shared with an agreed dedicated senior member of staff in the ELTO, such that appropriate Public Health action can be undertaken. Agreement of the student / staff member would normally be sought for this disclosure. Please note that this protocol does not abrogate employee responsibility to notify their employer under standard sick leave procedures.

HSE Public Health and/or HSE contact tracing teams follow up with confirmed cases of COVID-19 to identify their close contacts. Confirmed cases will be contacted directly by the HSE and contact identification will be initiated. As outlined above, if information gathered by the HSE during case investigation suggests a need for HSE Public Health input, then HSE Public Health will contact the ELTO directly to discuss further action, include Public Health Risk Assessment.

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<sup>12</sup> <https://www.hse.ie/eng/services/list/5/publichealth/publichealthdepts/contact/phoffices.html>

If a further Public Health action is required, HSE Public Health may contact ELTOs to request assistance in this regard. ELTOs have a crucial role in collecting and maintaining attendance records and information on potential close contacts among students. This information will assist HSE Public Health in undertaking Public Health Risk Assessment.

## **Definition of Close Contact**

It is a matter of expert judgement by a Public Health doctor as to whether a given contact constitutes 'close contact'. The *Health Protection Surveillance Centre* (HPSC) defines close contacts as follows:

- Greater than 15 minutes face-to-face (<2 metres) contact with a confirmed case of COVID-19 in any setting
- Household contact of a confirmed case of COVID-19 (i.e. living or sleeping in the same home, individuals in shared accommodation sharing kitchen or bathroom facilities and sexual partners.)
- Sharing a closed space, including a workspace, with a person infected with COVID-19 for longer than two hours – in this situation you may be considered a close contact. A risk assessment will be undertaken by HSE (Public Health) to determine whether you are a close contact – the risk assessment will consider multiple factors, including the occupancy of the room, size of the room, ventilation and the distance of each individual from the confirmed case. If you are considered to be a close contact after risk assessment, you will be contacted by HSE and advised of appropriate action (i.e. restricted movements, COVID-19 testing).

If you have had close contact with an infected person when they are deemed to be infectious you will be contacted by the HSE and advised re appropriate action., i.e. restricted movements and COVID testing.

If there is any information from the HSE COVID Tracker App, this information will be considered in a Public Health Risk Assessment (PHRA). It may be that Public Health might determine that some people who have not been notified by the App are close contacts. Public Health risk assessment and advice takes precedence over the App. This is because the Public Health Risk Assessment (PHRA) collects more nuanced, composite information to better appraise infection transmission risk in defined circumstances.

## **5. Public Health Risk Assessment (PHRA)**

Management of cases and outbreaks of notifiable infectious diseases is the legislative responsibility of the Medical Officer of Health (MOH), HSE Public Health. If information gathered by the HSE during case investigation suggests a need for HSE Public Health input, then HSE Public Health will contact the ELTO directly to discuss further action. The Medical Officer of Health (Consultant in Public Health Medicine, MOH), and teams will liaise directly with the ELTO's designated ELE COVID-19 Outbreak Coordinator who will be the ELTO's Operations Manager or Health & Safety Officer and inform them of the confirmed case, as necessary. The Public Health team will undertake a Public Health Risk Assessment to inform any further actions and recommendations by the Medical Officer of Health

## **ACTION FOR ELTOs**

To facilitate/assist Public Health action when requested by HSE Public Health and to manage cases and outbreaks and identify relevant contacts, ELTOs should have prepared a summary outlining the below ready to give to the Medical Officer of Health as part of the statutory investigation and management of COVID-19:

- A brief description of the ELTO (type, numbers of staff and students, layout, capacity, timetables, etc.);
- A list of staff with up to date, accurate contact details (telephone numbers);
- A broad description of classrooms/settings involved in an outbreak situation, e.g. capacity, how many people were in the class/setting, configuration/layout and prevention measures implemented e.g. physical/social distancing, wearing of masks etc.
- The ELTO should record attendance by students and staff at all scheduled classes and retain records for 28 days (2 incubation periods for SARS-CoV-2 infection) in case required for contact tracing purposes.
- Staff are required to keep a personal log of their attendance and location on site on a daily basis.
- ELTOs should consider encouraging staff and students to maintain an individual COVID-19 Contact Diary to record details of their movements and activities when on site, including what locations they accessed, who they had contact with and for how long in each case. Students should be requested to record their seat location in classrooms if applicable. These contact diaries, and similar records maintained by staff and students, should then be made available to the HSE for contact tracing and risk assessment purposes as required.
- ELTOs should encourage students and staff to download and use the Government's COVID-19 Tracker App.
- ELTOs should consider optimal processes for the gathering and distribution of the above information which may include technological solutions (e.g. QR codes).

## **6. Public Health Principles and Outbreak Control**

- Management of all outbreaks of notifiable infectious diseases, including COVID-19, is led by HSE Public Health in line with current legislation. HSE Public Health will liaise with ELTOs as required for the purposes of risk assessment/outbreak management/contact tracing.
- Core to the PHRA is assessment of the likelihood of onward transmission of COVID-19 from the confirmed case. This, and other factors, inform further actions.
- In the context of a confirmed case with links to an ELTO, HSE Public Health will assess whether the case was in an ELE setting during the infectious period. If they were not on site during the infectious period there may be no further implications for the ELTO and no need for further testing of students/staff in the ELE setting – this decision will be made by HSE Public Health.
- Further testing requirements/strategy will be determined by the Public Health Risk Assessment, with due consideration of factors including the likely source of infection and potential for onward transmission within or beyond the ELE setting.

- The risk assessment will be dynamic and may change as new information becomes available.
- Close contacts will be identified following PHRA and contact tracing may require engagement with the ELTO. Close contacts will be tested as per national guidelines (under current guidelines, Day 0 and 7 testing is offered to close contacts) and will be advised to restrict their movements, access testing as advised, and remain alert for symptoms of COVID-19, as per national guidelines.
- The testing strategy may evolve as information accumulates and unfolds.
- There may be other community close contacts who will be excluded from the ELTO as a result of their community exposure outside of the ELE setting e.g. household exposure / exposure in a social setting.
- Following PHRA, the HSE Medical Officer of Health (MOH) may recommend more widespread testing within a class group if indicated.
- An Outbreak Control Team may be convened by HSE Public Health if deemed appropriate to assist the Medical Officer of Health in the investigation and control of COVID-19 cases and outbreaks
- A general outbreak plan for COVID-19 outbreaks can be found [here](#).

The PHRA will consider information, including the following, to inform control measures:

- unique information and factors relevant to each ELTO, including infrastructure, and how these factors impact risk of COVID-19 transmission;
- interactions of students and staff, both within the ELE setting and in the wider community;
- patterns of infection within the wider community;
- infection rates in the surrounding areas of the ELTO.

This information will inform decisions regarding control measures, up to and including the need for full or partial closure of an ELTO. A range of issues (e.g. multiple cases in different buildings and/or locations within an ELTO) may inform a decision by the Medical Officer of Health to advise closure/partial closure of an ELTO, if the Medical Officer of Health considers that maintaining an open facility presents an ongoing risk to students, staff and the wider community. Additionally, keeping an ELTO open may not allow for adequate control of the spread of infection or removal of conditions favourable to infection.

### **Consideration of the need for full, or partial, closure of an ELTO**

If there is a need for full or partial closure of an ELTO, this will be discussed with the ELTO by the MOH/regional Department of Public Health.

Decisions in relation to closure or partial closure of ELTOs will be made by HSE Public Health following risk assessment. Risk assessment enables HSE Public Health to appraise the likely health impacts of a range of possible interventions, including implementation of enhanced infection prevention and control measures, exclusion and testing of a small group of students/staff. The actual criteria used by the MOH in undertaking a risk assessment may be modified in light of local

conditions or specific local information. Risk assessment facilitates Public Health doctors in making sensible, safe, proportionate decisions to protect the health of students and staff. These decisions may include closure of an ELTO, with defined criteria for reopening when appropriate.

### **Criteria for closure (full or partial)**

Decisions regarding the need for full or partial closure of an ELTO are made by the Medical Officer of Health, informed by Public Health Risk Assessment. Criteria typically considered in the risk assessment include, but are not limited to:

1. Evidence or clear concern that spread within the ELTO is the primary driver of confirmed and suspected cases. This is as opposed to spread of infection externally within the community setting (e.g. within households where students / staff members live etc).
2. The numbers of, or rate of increase of, COVID-19 cases detected among students/staff is concerning.
3. Physical structure or layout of an ELTO which limits the range or adequacy of implementation of recommended preventive measures e.g. social distancing, specific recommendations relating to infection prevention and control, e.g. environmental cleaning and hygiene measures.
4. Any evidence that significant spread in the wider local community is significantly linked to the ELE setting.
5. Results from testing and contact tracing identify a large number/high proportion of asymptomatic cases, particularly among individuals not previously considered to be close contacts/at higher risk of infection transmission.

COVID-19 outbreaks in ELTOs will be assessed on an individual basis and a unique decision made as to whether it is safe for the ELTO to remain fully or partially open, or whether closure is necessary. In all instances in which closure of an ELTO is being considered, the criteria guiding closure will broadly provide the criteria for reopening. However, outbreaks are dynamic, and in the course of the HSE Public Health investigation new risks may be identified and therefore new parameters required to be included among criteria for re-opening. A list of the agreed criteria for closure (including, for example, high rates of disease, the requirement for decontamination to a level that meets with the approval of the MOH, compliance among management and staff in relation to control measures requested by the MOH, etc.), will form the basis for the criteria to guide reopening. Only when all these criteria, and any additional criteria identified in the process of HSE Public Health outbreak investigation, have been met, will a decision be taken by the MOH in relation to reopening, or full return of students /staff to the ELTO.



## Appendix 1. Legislative role of the Medical Officer of Health

### Infectious Disease regulations

The Infectious Diseases Regulations (S.I. No. 390 of 1981) confer a general power on the Medical Officer for Health (MOH) to *“take steps...for preventing the spread of [an]infection”* where the MOH is aware of a suspected case of infection or a probable source of infection. The 1981 Regulations were amended by S.I. No 53 of 2020, to include COVID-19. Article 11 of S.I. No. 390 provides that:

*“On becoming aware, whether from a notification or intimation under these Regulations or otherwise, of a case or a suspected case of an infectious disease or of a probable source of infection with such disease, a medical officer of health, or a health officer on the advice of a medical officer of health, shall make such enquiries and take such steps as are necessary or desirable for investigating the nature and source of such infection, for preventing the spread of such infection and for removing conditions favourable to such infection.”*

This power may be enforceable by the risk of criminal liability under Article 19: *“19. A person who refuses to comply with a requirement or direction given or a request for information made in pursuance of any of the provisions of these Regulations shall be guilty of a contravention of these Regulations.”*

After investigating the outbreak, and having put in place the necessary prevention measures, the MOH may determine that there is an ongoing risk to staff, pupils or the wider community. In this instance, a recommendation to close, or partially close, an educational facility may be made based on criteria and powers in S.I. No. 390 of 1981. The reasons for closure, and criteria for reopening, should be clearly communicated.

**Appendix 2. Sample Table of roles & responsibilities in managing COVID-19 Health and Safety and responding to a confirmed case of COVID-19 in an ELTO.**

Persons / Role	Responsibilities	Note
Student	<ol style="list-style-type: none"> <li>1. Student has a responsibility to practice social distancing, wear a face mask at all times while on site and to follow the ELTO's COVID-19 School Safety Protocols.</li> <li>2. Keep a record of their activities on site and their "close contacts".</li> <li>3. Download and have active the COVID-19 Tracker App</li> <li>4. Keep a record of on site classes attended.</li> <li>5. Keep a record of what seat was used for each class.</li> <li>6. Keep a record of social contacts and activities.</li> <li>7. Contact the ELTO as soon as they become aware that they are a positive case.</li> </ol>	<p>Failure by a student to use the App or to keep proper records of the classes they attended and where they sat may result in poor quality/insufficient data being passed to the HSE Public Health and/or Contact Tracing Centre, thereby compromising the HSE response to cases/outbreaks and could lead to entire classes being advised to isolate and needing to be tested.</p>
Staff Members	<ol style="list-style-type: none"> <li>1. Staff has a responsibility to practice social distancing, wear a face mask at all times while on site and to follow the ELTO's COVID-19 School Safety Protocols.</li> <li>2. Download and activate the COVID-19 Tracker App.</li> <li>3. Ensure that they know their 'work pod' if applicable.</li> <li>4. Keep a record of on site activities, e.g. classes taught, meetings attended, social activities, etc.</li> <li>5. Contact the ELTO as soon as they become aware that they are a positive case or if they share a household with a confirmed case.</li> <li>6. Take note of seating arrangements in class, i.e. being able to provide room seat mapping to assist contact tracing/risk assessment.</li> </ol>	<p>Failure by a staff member to use the App or to keep proper records of their movements/contacts may result in poor quality/insufficient data being passed to the HSE Public Health and/or Contact Tracing Centre, thereby compromising the HSE response to cases/outbreaks and could lead to entire classes being advised to isolate and needing to be tested.</p> <p>The HSE could apply a precautionary approach to a positive case in such a staff member and advise that a wide range of their colleagues self-isolate and be tested. Whilst the numbers involved here may be less than with a learner who does not keep adequate records,</p>

		<p>there is always the potential for business continuity issues for the ELTO if a large group of staff have to isolate.</p> <p>Being able to provide room seat mapping to assist contact tracing/risk is critical to ensure timely identification of relevant cohorts.</p>
<p>ELTO Owner/Director</p>	<ol style="list-style-type: none"> <li>1. Ensure that within their ELTO exists a set of class lists for each course detailing which learners were assigned to which face to face session.</li> <li>2. Ensure that this information is readily available for consultation by at least two nominated persons.</li> <li>3. Provide details of nominated persons to the ELTO Operations Manager/ Health and Safety Manager</li> <li>4. Ensure that they have a communication process in place for contacting lists of learners as and when required / advised.</li> <li>5. Ensure that where necessary students and staff have been assigned to 'work pods' so as to limit their close contacts amongst their colleagues and fellow students.</li> <li>6. Form part of the COVID-19 Management and Outbreak Response team.</li> <li>7. Work collaboratively to assist in the implementation of measures and monitor adherence to the measures to prevent the spread of COVID-19.</li> <li>8. Support the implementation of the measures identified in national protocols and guidelines.</li> </ol>	<p>This is a critical point in the management of on site cases. A lack of access to class lists will slow down and stunt any response to same. If this information is not easily accessible then there will be considerable challenges in identifying who needs to send targeted communications, who may need to isolate and who may need to be tested.</p>

<p>ELTO Centre/Operations Manager / Health &amp; Safety Officer</p>	<ol style="list-style-type: none"> <li>1. Act as a central coordination point for the ELTO's response to a suspected/confirmed COVID-19 case on site.</li> <li>2. Coordinate the collection of data in the early stages of the ELTO's response for forwarding on to the Contact Tracing Centre (CTC).</li> <li>3. Ensure that key persons are kept informed as to the progression / status of any response where appropriate.</li> <li>4. Act as the ELE central point of contact for the HSE / Public Health.</li> <li>5. Ensure that key persons are kept informed as to the progression / status of any HSE PH response.</li> <li>6. Liaise with the ELTO's owners/directors/academic management in relation to classroom mapping, collation of information about ventilation, room layout, etc.</li> <li>7. Liaise with the ELTO's owners/directors/academic management regarding class lists and messaging to students.</li> <li>8. Liaise with the HSE regarding information flow to the Contact Tracing Centre, messaging to affected learners, other medica / risk assessment issues (as appropriate and in consultation with HSE Public Health).</li> <li>9. Form part of the COVID-19 Management and Outbreak Response team.</li> <li>10. Work collaboratively with the employer to assist in the implementation of measures and monitor adherence to the measures to prevent the spread of COVID-19.</li> <li>11. Support the implementation of the measures identified in national protocols and guidelines.</li> </ol>	<p>The role of the ELTO Centre/Operations and Health &amp; Safety Manager is key. If they fail to collect adequate, and accurate, information, then the response to any confirmed case/outbreak on site will be compromised. The more data that the ELTO Centre/Operations Manager and Health &amp; Safety Officer can collect and pass on to the Contact Tracing Centre the more targeted the response of all parties can be.</p>
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<p>ELTO Manager Nominees</p>	<ol style="list-style-type: none"> <li>1. Ensure that they are familiar with how to access the information regarding which student has been assigned to which face-to-face class.</li> <li>2. Be familiar with the communication process for contacting designated students.</li> <li>3. Form part of the COVID-19 Management and Outbreak Response team.</li> <li>4. Work collaboratively with the employer to assist in the implementation of measures and monitor adherence to the measures to prevent the spread of COVID-19.</li> <li>5. Support the implementation of the measures identified in national protocols and guidelines.</li> </ol>	<p>A lack of access to information regarding which student has been assigned to which face-to-face class will slow down and stunt any response to same. If this information is not easily accessible then there will be considerable challenges in identifying who needs to send targeted communications, who may need to isolate and who may need to be tested.</p>
<p>ELTO Academic Manager</p>	<ol style="list-style-type: none"> <li>1. Ensure that where necessary teachers and students have been assigned to 'work pods' so as to limit their close contacts amongst their colleagues and fellow students, and ensure that this information is available to ELTO Owner/Director, Operations Manager/Health &amp; Safety Manager and Manager Nominees.</li> <li>2. Form part of the COVID-19 Management and Outbreak Response team.</li> <li>3. Work collaboratively with the employer to assist in the implementation of measures and monitor adherence to the measures to prevent the spread of COVID-19.</li> <li>4. Support the implementation of the measures identified in national protocols and guidelines.</li> </ol>	
<p>ELTO Caretaking/ Cleaning Services</p>	<ol style="list-style-type: none"> <li>1. Arrange rapid decontamination of affected rooms following a suspected/confirmed case on site (based on HSE advice).</li> </ol>	<p>This is critical to ensuring health and safety on site.</p>
<p>Lead Worker Representative</p>	<ol style="list-style-type: none"> <li>1. Form part of the COVID-19 Management and Outbreak Response team.</li> <li>2. Work collaboratively with the employer to assist in the implementation of measures and monitor adherence to the measures to prevent the spread of</li> </ol>	<p>"The number of representatives appointed will, ideally, be proportionate to the number of workers in the workplace and these key personnel will be clearly identifiable in the workplace"</p>

	<p>COVID-19.</p> <p>3. Support the implementation of the measures identified in national protocols and guidelines.</p>	<p>(<a href="#">Return to Work Safely Protocol</a>, p. 2). In an ELE context there is ideally at least one lead worker representative from each department, e.g. academic/teachers and operations/admin.</p>
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## **Appendix 3. ELE Ireland COVID-19 Protocol Documents.**

1. ELE Student COVID-19 Accommodation Protocols
2. ELE Ireland Airport Pickup Protocols
3. ELE Ireland Pre-Arrival Documents Protocols
  - ELE Ireland Advisory to Students already in the State
  - ELE Ireland Advisory to Prospective Students
4. ELE Ireland Protocols for dealing with a Suspected or Confirmed Case of COVID-19
5. ELE Ireland Online Provision Protocols
6. ELE Ireland Under-18s Guidance Protocols