CARDIFF SIXTH FORM COLLEGE

COVID19

RISK ASSESSMENT

Introduction



Since the start of the pandemic, Cardiff Sixth Form College has taken a proactive approach to ensuring that education can continue uninterrupted and that all members of the community can remain safe. Our priorities are education, safety and wellbeing – we deploy robust measures and plan for flexibility, within a culture of individual and corporate responsibility.

Having successfully managed the partial closure of the school in March 2020 and January 2021, and having successfully transitioned to full reopening in September 2020 and March 2021, this latest update to our Risk Assessment outlines how we will operate from September 2021. We plan on the understanding that the virus continues to present a threat and that we are able to organise the college in such a way as to deliver exceptional educational opportunities in an environment which is as safe as possible.

https://gov.wales/schools-coronavirus-guidance

From September 20, 2021, schools in Wales operate under a new framework: <u>https://gov.wales/local-covid-19-infection-control-decision-framework-schools-autumn-2021-html</u>

We have carefully analysed this framework and continue to operate with careful measures in place to control the potential risks. By default, we operate under the guidance required for 'very high' risk. We do this as we are confident that it is the safest way to ensure continuity of education and that we are able to deliver an enriching experience, with these measures in place.

This Risk Assessment document analyses all aspects of Cardiff Sixth Form College's operations, in five categories:

- 1. Overall Risk Assessment in the COVID-19 Environment
- 2. Pupils, Parents & Staff Risk Assessment in the COVID-19 Environment
- 3. Medical Risk Assessment in the COVID-19 Environment
- 4. Boarding Risk Assessment in the COVID-19 Environment
- 5. Facilities Management Risk Assessment in the COVID-19 Environment

Risk	Control Measures	Outcome	Remarks / Re-assessment
Ensure the college is operating in line with all Welsh Government advice, guidance and legislation.	 Principal & Head review all UK and Welsh Parliament (WP) advice, daily, and report back to Managing Director and SMT. Bulletins from Dukes, BSA, ASCL and other member organisations are scrutinised, daily. Head/Principal always attend BSA/WBSA/WISC conferences and operate with reference to guidelines set by these organisations as well as the requirements of CIW for operation as a boarding school in Wales. All changes to policy are sent to MD and other governors for approval. 	All policies and communications conform with and communicate the latest advice. 27/08/21 Full read-through and thorough check by CSFC CRT 27/08/21	 CSFC considers UK and WP advice and control measures to represent a <i>basic minimum standard</i> and considers best practice from around the world when considering its own control measures. All current UK and WP advice and guidance is applied immediately and explained in regular communications. All College RAs and policies will be reviewed and amended in line with latest advice, as soon as advice changes. Full audit 27/08/21 Governors approve all policy changes and this RA. A named Governor is responsible for overseeing all college decisions and action in relation to Covid-19. All CSFC students, parents, staff, guardians & agents (CSFC Community) were sent a copy of the latest Reopening & Continuity Policy on 13/08/21. All CSFC Community sent an update, in the weekly letter 27/08/21 outlining changes to the travel/isolation rules made on 25/08/21

1. Overall Risk Assessment in the COVID-19 Environment

Ensure effective communication with staff, students, parents, guardians and other stake-holders.	 Head writes to all parents, guardians, agents, students and staff regularly, outlining all updates and offering clarity and an explanation. MD receives all communications. Until July 2020, these communications were daily. From July 2020, they were weekly (Fridays). This has continued (save a short break of 5 weeks in the summer 2021) Clear channels of daily communication in place through Outlook and ISAMS. 	Parent survey (May 2020) praised CSFC response and its communications.	CSFC will assess impact of communication on reopening – i.e. do students and staff understand the rules and guidance on return? Induction and training for all staff and students will take place. Entire school community receives a copy of the Reopening & Continuity Policy, whenever it is updated. They are sign-posted to this document, whenever it is updated.
Ensure no unauthorised access to college or visitor who may potentially cause risk of infection.	Strict visitor management policy in place. All visits recorded and details of visitors are given on arrival. CSFC committed to following Welsh Test, Trace, Protect strategy. Access to college managed with card access and security presence. If essential work is required on site, contractors are properly registered, supervised and temperature checked.	A clear record of visitors is safely maintained in line with both the Welsh Test, Trace, Protect strategy and GDPR. Current policy of no visitors other than approved by Principal/Head remains in place. All security equipment checked and serviced, in August.	Policy will remain that visitors are not allowed other than if specifically approved, in advance, by Principal/Head. Will be reviewed at the end of September.
Communicate Social Distancing (SD) and hygiene/respiratory rules; ensure they are understood and applied.	SD and hygiene measures in place since February 2020. Regularly reviewed. Communicated in different languages through signage around the college. Regularly communicated through written communications and weekly assemblies.	The CSFC community received a copy of the college's Covid-19 reopening and continuity document (13/08/21). All stakeholders given the opportunity to comment on SD measures.	A complete COVID19 policy is published to all stakeholders which outlines SD and Hygiene rules in detail. Full Assemblies delivered by Head during Induction (in September) outline the rules and expectations. Repeated regularly. <i>Face masks</i> – In line with Welsh guidance, we ask all members of the college community to wear a

	To be communicated through student/staff induction and training in September 2021.	All stakeholders given email addresses to respond to. Feedback, to Heads of Houses or to Principal's PA, remains consistent and supportive.	mask in all areas of the building and invite them to continue to wear a mask in a classroom. The exception is the dining hall, when eating. 13/08/21 – all new rules and guidance published in official Wales documentation (link above page 1) reflected in the CSFC policy document.
Ensure adequate supplies of hygiene materials/resources.	Bursar and Facilities Manager regularly reviewing supplies and have sourced adequate supplies prior to reopening. Reviewed at weekly CMT (College Management Team) meeting.	Significant supplies of relevant hygiene materials/resources sourced during July/August 2020.	Operations Manager and Bursar have overseen the purchasing of supplies. CSFC is well-stocked. Principal has approved the resourcing. 10/08/21 – Stock for coming term confirmed.
Maintain hygiene standards by increasing cleaning and monitoring its impact.	Cleaning regime increased to highest possible level in March and continued. Deep cleaning of all facilities took place throughout May. Cleaners and all staff know to report any concerns. Cleaners conduct daily checks of all areas. Bursar regularly monitors impact with cleaning contractors and revises cleaning measures, as required.	Once deep-cleaned, areas of the college were sealed to ensure their safety for reopening. The increase in cleaning continues. Regular sanitising of door handles and all surfaces. Staff to be trained on how to sanitise equipment and resources after usage.	Cleaning regime established between Bursar and cleaning providers. Highest standard of thorough cleaning to be delivered. Students and staff shown how to use sanitising equipment. Teachers advised to clear all classrooms of non- essential items, leaving only chairs, tables, essential IT equipment. All classrooms being prepared with clear plastic screens for teachers and sanitising wipes which teachers will use to wipe down surfaces after every lesson. All teachers sanitise every classroom before leaving them at the end of every lesson
Safe full return to in- school learning from 06/09/21	Full scrutiny of new guidance. Staff training	Plan for full return of all students from end of August with all of the measures in place in this RA and in our	Class sizes, timetable, lunch timetable, online activities, seating plans, SD and hygiene rules all proven to be successful from 2020-21.

Student induction. Boarders return from 28/08/21Clear consultation with WISC, WBSA, ASCL	Reopening & Continuity Policy.	Full H&S audit confirmed complete
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2. Pupils, Parent and Staff Risk Assessment in the COVID-19 Environment

Risk	Control Measures	Outcome	Remarks / Re-assessment
Contact outside college with an individual or individuals who may be infected.	REACH boarding database records all requests for leave from the boarding accommodation. All leave requests are scrutinised by CSFC staff and boarders must present a valid reason. Boarders are not allowed to leave boarding accommodation other than to follow prescribed exercise routes or visit approved retailers as per a list that is updated, regularly (risk assessed by college staff). Staff monitor this. Other, individual and specific reasons may be requested with advance notice. CSFC requested that families report confirmed/suspected cases to college for (anonymous) record-keeping. All students remain in college throughout the school day.	Since February 2020, there has been no instance of community transmission within the college, during term time.	All returning boarders are required to follow the full Welsh guidance and law on testing, travel and isolation. https://gov.wales/coronavirus-travel All students and staff will be tested for Covid- 19 prior to the reopening of the college. Staff and local students given clear guidance on travelling to and from college and on reporting any contact with an individual who has disclosed that they have displayed symptoms. CSFC committed to following Welsh <u>Test</u> , <u>Trace</u> , <u>Protect</u> strategy. Any boarder leaving college must have their leave approved by staff. Only approved outlets (as outlined in the weekly letter) can be visited and daily exercise routes must be followed.
Operate school transport in line with SD, hygiene, PPE and cleaning arrangements.	School minibuses being operated in line with all CSFC hygiene and cleaning arrangements and current Welsh guidance	All students to wear a face- covering on school transport and to use transport in line with college policy.	School transport has been prepared by Student Services Manager

Register all students effectively and to monitor health.	Registration continues through ISAMS whether teaching online or in college. Temperature checks in place in Reception & boarding houses via temperature scanner. Absences followed up by Heads of Houses and recorded in line with Welsh guidance	Health-checks through medical centre for any student displaying symptoms which suggest Covid-19.	Temperature scanner in reception & boarding houses operational since 12.08.20. All students and staff required to sign in and out of college as normal, with their ID cards. All absences followed up immediately.
Configure transit spaces (corridors), social zones (car parks, common rooms) to SD rules.	 Full transit (one-way) system devised (15/05/20). Principal approved all measures on 20.07.20. Areas where one-way is not possible have mirrors installed to ensure individuals wait until corridor is clear. Staff responsible for ensuring that corridors are clear prior to students exiting classroom. 	Clear new guidance published to all students and staff in advance of reopening 13/08/21. All signage in place at the point of reopening.	CSFC will review the effectiveness, daily, and adapt when necessary. 27/08/21 increased capacity for dining hall area
Operate learning and recreational spaces to SD rules.	All learning and recreational spaces configured from 15/05/20. Following Welsh guidance, classes can be taught to capacity. Distancing/masks encouraged and well managed. Teacher screens in place. Teachers teach from behind a clear screen or a clear face shield. Sporting/recreational and all other co- curricular activities covered in Covid policy. Each examined on individual merit and appropriate measures in place. Reviewed regularly.	Clear new guidance published to all students and staff in advance of reopening. All signage in place at the point of reopening. Policy of no gatherings >30 people; activities that can proceed online shall do so; all assemblies and meetings online until further notice.	 CSFC will review the effectiveness, daily, and adapt when necessary. CMT meetings (weekly) will record any reported incidents and subsequent adaptations. Principal and Head observed all classrooms to ensure they were appropriately configured. Classrooms cleared so that all surfaces are free of equipment. Teachers continue to adhere to correct SD rules within the classroom. Online 'hybrid' lessons via webcam available to students who are legally unable to leave their country or isolating for a specific Covid reason 27/08/21

Operate staff meetings and staff shared areas in line with SD regulations.	All staff meetings online Staff room configured to SD requirements. Staff work rooms, likewise. Staff lunches (packed lunch) delivered to staff room. Small in-person meetings allowed in line with the number of persons specified on the door of each meeting room.	Induction and INSET to cover all aspects of new SD and to ensure staff understand their rights and responsibilities	Staff have engaged in consultation process and individuals have engaged with the SMT over their circumstances.
Operate timetable to limit interaction between year-groups and any other 'bubble'	Dynamic timetable (three different versions of the timings) devised to adapt to changing circumstances. Operating timetable includes movement time and staggered meal times to ensure limited movement and interaction.	Boarding staff to ensure numbers of students entering the college to be kept small and consistent in the mornings and to assist in the monitoring of all meal times. Timetables produced to maximise the number of double lessons, in order to reduce movement. Extended moving time built into the timetable between lessons. Single subject lessons allocated the last slots of the day on the timetable and can be taught online. Staggered lunchtimes incorporated into timetable.	GCSE students have a separate timetable to the A-level students. All measures (published in full policy) to ensure SD of staff are place. Meal-times and other social times organised to ensure SD.
Ensure appropriate monitoring of staff and pupils to ensure they are complying with hygiene rules and the use of PPE.	CMT, Heads of Depts, SMT, Prefects act as monitors. Infringements to be addressed in line with published policy and reported at weekly CMT meeting if required.	Staff and student training will occur during the INSET and student online induction.	Staff training will commence the last week in August and there will be sessions in INSET for staff. Pupils will be notified of college rules and changes and will be trained on the use of mask

Adapt pastoral/safeguarding systems to the new circumstances.	Excellent pastoral systems in place. Safeguarding, house team, boarding staff, wellbeing officer. All pastoral workers have been fully informed and involved in decision-making. Pastoral/safeguarding policies and process adapted to new circumstances. Weekly safeguarding update to governors. Full review of policies (to include addendums for Covid-19) and SCR in advance of re- opening.	CSFC policies adapted, as required by 01/09/21 DSP/ADSP all contactable via website and other communication methods	 wearing, hand washing etc. during the student online induction. Members of SMT continue to regularly monitor classroom delivery to ensure that staff and students are complying with SD rules and the use of PPE within the classroom. All policies adapted to reflect the new circumstance. Staff induction and INSET will be delivered by 06 September, covering all pastoral and safeguarding control measures. Online pastoral support has been put in place, including the revision of the college pastoral programme to be fully available online. The college Wellbeing website, the Wellbeing Hub is also being updated for students weekly. Students and staff can contact the safeguarding
Ensure wellbeing provision is exceptional.	New wellbeing website activated. Excellent feedback and an award nomination. Student-led initiatives also in place. Co/super-curricular activities re-configured to ensure social distancing or moved online.	All co/super-curricular activities moved online or re-configured for SD. Heads of Houses in regular contact with all students. Boarding staff designing in- house activities and physical activities in line with SD.	team at all times, as normal. Staff/student induction and training to include this. Wellbeing monitored and led by Head of Pastoral. School Wellbeing Officer continuously available. All extra-curricular and pastoral programme activities have been adapted to suit online delivery.

Operate daily arrival and collection procedures to reduce contact.	Small local (day) student community invited to consider their individual travel circumstances with their Head of House. Staggered arrival of boarders managed by boarding staff. Study-periods supervised.	Current procedures included in full policy.	To be included in student/staff induction and training.
Ensure staff can operate both online and in classrooms.	Plan for delivering learning online, in classroom and in hybrid approach.Audit of IT equipment led by Operations Manager.Webcams installed in all classrooms.	Each dept. and individual teacher has planned and prepared for a variety of delivery approaches. From Sept 2021, all learning will be in-person. Hybrid access available if legally unable to leave home country or if isolating for a covid-specific reason.	Various scenarios have been planned for and all staff have experience of teaching online, hybrid and in-person. Induction (31.08.21-06.09.21) will be online and in-person. In-person lessons begin from 07.09.21.
Operate all mealtimes in line with SD requirements.	 Dining hall reconfigured. 'Grab and go' option available. Staff meals (packed lunches) prepared to reduce numbers in dining hall. Timetable reconfigured to reduce numbers in the dining hall. PPE, hygiene resources and extra measures in place to ensure exceptional hygiene standards. 	Holroyd Howe and CSFC have worked together to find the best solutions. A plan is in place to ensure three quality meals are delivered to all students who are in isolation for any period of time, due to Covid-19. Staggered lunchtimes incorporated into timetable.	New layout of the dining hall, mealtime rota, queuing system and servery all agreed. To be tested in the first fortnight and adapted as required. Staff are on duty to monitor and ensure that students adhere to the SD regulations of the dining hall and sanitising their spaces after use.

3. Medical Risk Assessment in the COVID-19 Environment

Risk	Control Measures	Outcome	Remarks / Re-assessment
Ensure supervision of Medical Centre staff.	Liaison takes place with the local GP surgery. Guidance from Public Health Wales will also be followed closely, along with all guidance from the WP. Dukes Education Medical Advisor engaged as a consultation source for medical advice with special reference to Covid-19. Deputy Head, Pastoral, meets regular with Medical Centre staff.	The partner of City Surgery liaises with the Deputy Head, Pastoral. Dukes Education Medical Advisor liaises with Deputy Head, Pastoral and School Nurses.	All induction materials will be online via live and pre-recorded sessions. Students will complete all documentation online. All HOHs will assist with this process online. Public Health Wales and the local GP practice continues to be liaised with and a forum for all Dukes nursing staff is in the process of being established to share good practice.
Ensure sufficient staff capacity to deliver temperature testing, isolating suspect COVID-19 cases, outside appointments and normal medical issues.	The college medical team are trained to deliver all required aspects of health care. Extra nursing staff have been engaged to provide better support for healthcare in school.	Online medical appointments discussed for general medical issues and appointments that are not linked to Covid-19.	Adapted operating plans in place to ensure adequate provision for covid and non-covid related issues. All covered in full policy. All students and staff will be tested for Covid- 19 prior to the start of term and retested after 3-5 days and as appropriate after this on advice from medical staff. The medical team check temperatures daily during term time prior to boarding students leaving accommodation for the main college building. Students and staff take a LFT twice-weekly.
Ensure medical policy, procedures and appropriate response to spectrum of medical	Revised in readiness for publication, prior to reopening. Covid-19 medical procedures have already been written and these will be	Procedures for dealing with symptomatic and suspected cases of Covid-19 are already in place.	All addendums to policies, including the college medical policy have been completed. This includes guidance for treatment of suspected Covid cases, a Covid full list of symptoms for staff and students to be aware of and college

issues be shared.	een revised and	shared again with staff prior to the college reopening.		procedures for treatment of those who may be symptomatic.
	nedical room(s) erly equipped.	The college medical team has prepared isolation rooms for students who are symptomatic. PPE has been sourced through the college Operations Manager.	PPE stored on the main college site. PPE is plentiful and enough stock has been ordered for the college team to conduct staff and student testing and function as normal for medical consultations unrelated to Covid-19	Videos from the college medical team and pastoral team will be available to all new and existing students over the induction in order to go through college rules in light of Covid-19, mask wearing, SD and also hand hygiene. The college induction will be online The staff Inset will address all changes and addendums to policies and procedures in light of Covid-19. Requests for further PPE as needed to go via the college Operations Manager and continue to do so.
aware of	school is fully all pre-existing conditions.	Records are in place and updating/review is underway.	Survey results analysed and records updated.	All information in place and up-to-date. New students are submitting a pre-arrival medical form. These will be checked and logged, as per each year on the student medical database. Missing/incomplete forms to be completed as a part of the enrolment/induction process. Any students with underlying health conditions, or pre-existing conditions which may make contracting Covid-19 more serious will be flagged. The college nurses have updated ISAMS with all medical information.
	accurate record wid-19 cases.	Records established in February 2020.	All records of testing and outcomes of tests are accurately stored in line with GDPR and	Test results to be maintained according to strict GDPR guidelines by medical staff and monitored by Deputy Head, Pastoral.

		subsequent action/communication is clear.	HR will keep records of any staff who have tested positive, or who have been in contact with known cases (following GDPR guidelines).
Ensure accurate record of all contact with confirmed cases of Covid-19.	Records in place. Record to be increased to include any contact with COVID 19 outside the UK. CSFC committed to following Welsh <u>Test</u> , <u>Trace</u> , <u>Protect</u> strategy.	Any contact with positive cases has been logged by HR.	HR will keep records of any staff who have tested positive, or who have been in contact with known cases. The medical staff will keep secure records of students who have tested positive, or who have been in contact with known cases (following GDPR and NHS guidelines).
Ensure accurate record of all who have been sent home with Covid- 19 symptoms (a new, persistent cough, high temperature or shortness of breath, loss of smell/taste.	Records in place.	Individuals immediately asked to take a Covid test.	HR will keep records of any staff (following GDPR guidelines). The medical staff will keep secure records of students (following GDPR guidelines). In-line with policy, all such individuals will immediately isolate and seek a test via NHS Wales. Any individual who is isolated or who goes home due to being symptomatic or having contact with a confirmed/suspected case will remain in full dialogue with CSFC as per published policy and all Welsh guidance.
Ensure there is a separate area for temperature testing, holding and isolation areas that are easily identified and regularly cleaned.	The college has separate isolation/holding areas which will continue to be used post- reopening. Areas for temperature testing also established.	The main isolation area for students symptomatic of Covid- 19 is supervised by medical staff and a new temperature monitor is set up in reception to check all temperatures on entry to the building.	Temperature testing is taking place for all staff currently on site and when term begins all staff and students will be temperature checked on entry to CSFC or boarding accommodation. Regular and thorough cleaning of all areas of the college site continues to take place.

4. Boarding Risk Assessment in the COVID-19 Environment

Risk	Control Measures	Outcome	Remarks / Re-assessment
Ensure boarding policies and procedures are updated, regularly reviewed and communicated.	Regularly reviewed and sent to governors. Boarding handbook and principles & practice are reviewed annually with a Covid-19 addendum to be published by 25/08/20.	Current boarding handbook and principles and practice are suitable.	
Ensure all security and access systems regularly checked, updated and re-coded.	Regularly reviewed and shared with governors. Operations manager and Head of Boarding review access arrangements termly. Risk assessments reviewed and updated.	Keypad outside Shand House will be checked with HOST Management Services	Thorough check and equipment service took place over the summer.
Ensure boarding staff have the appropriate PPE, cleaning materials and training.	Operations manager has secured adequate PPE. Training is in place for all boarding staff.	PPE procured for the start of term, to be given to staff during training.	Second stock check to take place after self- isolation period (for travellers) and second order to take place to get any additional PPE required for the rest of the school year.
Ensure separation and socialising rules are understood and adhered to in the boarding houses.	Monitored by boarding house staff and all issues are reported to the Head of Boarding. SD adhered to and all additional procedures published and explained in induction/training.	New procedures to be explained to students during induction.	Review of all new policies and procedures by 01 October; evaluation of impact and report back to CMT.
Ensure fire evacuation instructions and new procedures are reviewed, understood and rehearsed.	Full evaluation of fire evacuation procedures took place between Operations Manager and Head. Decision that to continue with current procedures (including practices) with face-coverings and as much distancing as possible was safest available option.	Current procedures communicated to all CSFC community as part of induction	To be explained during student/staff induction and tested during the first month of returning.

Put in place isolation rooms/zones and procedures.	Rooms and zones allocated as per existing policy (since February 2020). Continue to review.	Students are isolated in en-suite rooms. Every student has their own en- suite bathroom.	Room allocation check to take place before students arrive
Ensure student:staff ratio optimises medical and emotional support.	Ratios are safe and will be reviewed weekly. Additional staff recruited for September.	Careful deployment of staff overseen by Head of Boarding, Student Services Manager and Deputy Head, Pastoral	Staff:student ratios to be regularly reviewed.
Ensure all clothes and bed linen washed regularly and at appropriate setting (65°)	All bedlinen is currently washed regularly. Updated procedure is under review and will be published at the start of term.	Boarding staff to help with delivering laundry to help with SD	Will review laundry procedures with every Covid update.
Ensure boarders are able to stay-in touch with parents/loved ones.	All boarders have access to the internet. Boarders without their own devices can use college-owned phones.	Internet in both boarding houses is excellent. College-owned mobiles available in emergencies.	

5. Facilities Management Risk Assessment in the COVID-19 Environment

Risk	Control Measures	Outcome	Remarks / Re-assessment
Ensure heating system including fuel levels are sufficient.	Heating and air con system regularly tested.	Full Service of air-con completed on 12/07/2021 and full heating boiler service completed on 04/02/2021	No actions required
Ensure adequate gas supply, venting and valves.	Full review prior to reopening.	Full Service of Labs and Canteen gas completed on 20/07/2021	No actions required
Ensure all air conditioning ducts and units have been checked and reviewed.	Full review prior to reopening.	Full Service of air-con completed on 12/07/2021	No actions required

Ensure electrical tests up-to-date including emergency lighting and PAT.	Full review prior to reopening.	PAT testing up to date college required in December and Student items scheduled for testing in September.	Student item PAT testing scheduled for testing end of September 2021
Ensure water testing for temperature, flow and legionella.	Full review prior to reopening.	On-going, monthly as usual.	(14/08/20) Full drinking water sampling has taken place and all samples returned as good.
Ensure Fire Alarm panel, system and extinguishers in date and serviced.	Full review prior to reopening.	Full Service completed 30/07/2021	No actions required
 Ensure laundry washers and dryers are serviceable, able to cope with demand, temperature requirements and have sufficient washing products. 	Full review prior to reopening.	Head of Student Services to liaise with HOST and UNITE to ensure compliance	
Review all waste procedures.	Full review prior to reopening.	Reviewed in June and will review again in December	
Ensure pest control services recorded, deficiencies identified and actioned.	Full review prior to reopening.	Full site inspections carried out in July	No actions required
Ensure school vehicles fully registered, insured, maintained and stocked with appropriate hygiene materials if they are to be used?	Full review prior to reopening.	To be completed prior to reopening. Transport Manager (Head of Student Services) to review and ensure compliance by 01/09	