



Nadhim Zahawi MP
Secretary of State for Education
Sanctuary Buildings
Great Smith Street
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17 September 2021

Dear Secretary of State

DfE Guidance on Use of CO2 Monitors

The decision to issue schools with CO2 monitors, although long overdue, was one that we welcomed. We hope these will be rolled out as soon as possible. As Chris Whitty has set out, the offer of vaccination to 12 to 15-year-olds, though an important tool, is not a panacea. Ventilation remains crucial and we do have concerns about the quality of the guidance that the DfE has published to support use of the monitoring devices.

We are concerned that the guidance does not reflect the most up-to-date advice from SAGE and HSE and also that it is confusing for schools. In respect of the latter point, the guidance sets out that: *“A consistent value of over 800ppm should be seen as an early indicator to increase ventilation”* but goes on to state that: *“You should take action to improve ventilation where CO2 readings are consistently higher than 1500ppm”*.

The first statement implies that a reading of >800ppm is an early warning to take unspecified action, whereas we would argue that every effort should be made to keep the reading *below* this level in line with guidance from SAGE and HSE. SAGE guidance, describing rooms where loud speech, singing etc is taking place (most classrooms) sets out that they *“should aim to ensure ventilation is sufficient to maintain CO2 concentrations below 800ppm (typically 10-15 l/s/person) and should also include additional mitigations such as face coverings for audiences and restricting the size of groups and duration of activities”*. This layered approach is not recommended in any guidance to schools.

The HSE advises that *“where there is continuous talking or singing, or high levels of physical activity (such as dancing, playing sport or exercising), providing ventilation sufficient to keep CO2 levels below 800ppm is recommended.”*

The Chartered Institution of Building Services Engineers [CIBSE COVID-19 Ventilation Guidance \(pps.co.com\)](https://www.cibse.co.uk/~/media/Files/2020/09/CIBSE_COVID-19_Ventilation_Guidance.pdf) cites the SAGE advice noted above.

A further concern is that the DfE guidance states that there is no need to stop using the room, pending improvements to ventilation, regardless of how high the CO2 reading is, bringing the whole point of using the monitors into question. This instruction is also potentially contrary to the Workplace (Health, Safety and Welfare) Regulations 1992, which require all enclosed workplaces to be adequately ventilated. Where levels of CO2 are consistently high, continuing to use the room may be a breach of this regulation. In addition, putting COVID-19 aside, high CO2 levels have been proven to cause poor concentration and have a detrimental impact on learning therefore using rooms with high CO2 levels is not just a health and safety issue due to COVID-19, it is an educational performance issue also.

Finally, the current guidance provides little in the way of advice as to how to improve ventilation other than mentioning opening windows and providing a few links to other organisations' websites. There is much more that can be done. It is vital that practical suggestions on how to improve ventilation in rooms are given. We believe that staff and students could find themselves working in very poorly ventilated classrooms based on the DfE advice.

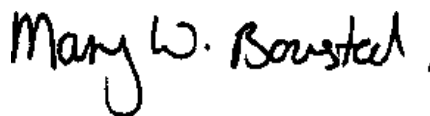
Could you please respond to us on the following questions:

- Why did the Department choose not to reflect fully HSE, SAGE or CIBSE guidance in its own guidance?
- Why does the Department advise that there are no circumstances in which a class should be relocated, and a room taken temporarily out of use while a ventilation issue is addressed? Is there no level of CO2 at which you consider that this should happen pending improvements to air quality? If not, this clearly detracts from the value of having CO2 monitors in the classroom.
- Now that you are aware of these discrepancies will the guidance be revised to incorporate additional elements included in the joint union guidance which itself draws upon expert advice from HSE, SAGE and CIBSE?

Yours sincerely



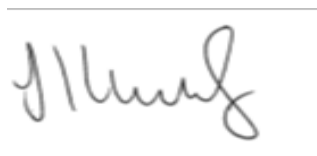
Joint NEU General Secretary



Joint NEU General Secretary



GMB National Officer



Unite National Officer

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UNISON Head of Education

Handwritten signature of the NASUWT General Secretary in black ink.

NASUWT General Secretary