ACTIVE LEARNING TRUST RISK ASSESSMENT

Educational Setting	Grove Primary School and Westwood Primary School
Activity / Task	Coronavirus (COVID-19) Risk Management Assessment
Completed by & Date	Rae Aldous – 1 st January 2022
Review Date	1 st April 2022

School Opening from January 2022

Positive Test

- Since Wednesday 22 December, the 10-day self-isolation period for people who record a positive PCR test result for COVID-19 has been reduced to 7 days in most circumstances.
- Individuals may now take LFD tests on day 6 and day 7 of their self-isolation period. Those who receive two negative test results
 are no longer required to complete 10 full days of self-isolation. The first test must be taken no earlier than day 6 of the
 self-isolation period and tests must be taken 24 hours apart. This also applies to children under five, with LFD testing at parental or
 guardian discretion. If both these test results are negative, and you do not have a high temperature, you may end your
 self-isolation after the second negative test result and return to your education setting from day 8.
- Health and social care workers, including those working in education settings, should follow guidance for their sector on taking LFD tests on day 8, 9 and 10. More information, visit <u>COVID-19: management of staff and exposed patients or residents in health</u> and social care settings.
- Anyone who is unable to take LFD tests will need to complete the full 10 day period of self-isolation. Further information is available in the stay at home: guidance for households with possible or confirmed COVID-19 infection.

Close Contacts

- People who are fully vaccinated, or children and young people aged between 5 and 18 years and 6 months, identified as a close contact of someone with COVID-19, should take an LFD test every day for seven days and continue to attend their setting as normal, unless they have a positive test result or develop symptoms at any time.
- Children under five are not being advised to take part in daily testing of close contacts. If a child under five is a contact of a confirmed case, they are not required to self-isolate and should not start daily testing. If they live in the same household as someone with COVID-19, they should limit their contact with anyone who is at higher risk of severe illness if infected with COVID-19, and arrange to take a PCR test as soon as possible. They can continue to attend an education or childcare setting while waiting for the PCR result.
- If somebody has tested positive within the last 90 days, they are strongly encouraged to take part in lateral flow

testing after their isolation period.

Asymptomatic testing for all school staff

- School staff will continue to complete a Lateral Flow Test twice weekly at home on a Sunday and Wednesday.
- There will be no testing of primary pupils, unless advised by Public Health and Suffolk County Council.
- All testing carried out in school will use lateral flow devices (LFD) which provide a result in 30 minutes.
- Staff with a positive LFT result will need to follow self-isolation guidance and obtain a PCR test to confirm the result.
- Anybody who receives a positive tests for Corona Virus and who is unwell must not attend school for ten days.

The risk assessment should be kept 'live' and should be reviewed during the first few days of opening and a copy of the completed risk assessment must be returned to Caroline Driver – caroline.driver@activelearningtrust.org.

CURRENT DfE, PHE, HSE and ACAS GUIDANCE – PLEASE ADD AS NEW GUIDANCE IS ISSUED

General Advice

List of all general Coronavirus guidance: <u>Link</u> General .GOV.UK Coronavirus guidance: <u>Link</u> Mass asymptomatic testing: schools and colleges - Link Mass asymptomatic testing – specialist schools - <u>Link</u> COVID-19: guidance on shielding and protecting people defined on medical grounds as extremely vulnerable - <u>Link</u> Coronavirus (COVID-19): safer travel guidance for passengers - <u>Link</u>

DfE Advice

List of all DfE Coronavirus guidance for schools: Link - 0800 0468687 Reopening of Schools in September 2020 guidance: <u>Link</u> DfE advice for safe working in Education Settings, including PPE: <u>Link</u>: DfE Social Distancing in Education settings guidance: <u>Link</u> DfE Primary-specific guidance: <u>Link</u> DfE Second-specific guidance: <u>Link</u>

DfE Scientific Advice regarding COVID-19: Link

DfE Cleaning Advice for Non-Healthcare Settings for COVID-19: Link

How to do your COVID test leaflet to explain testing to pupils, students, parents and staff.

<u>A leaflet</u> explaining what a positive or negative test result means for a child and their household, and the support available has been adapted by local public health colleagues. It includes local contact details for the school nursing service and a link to the SCC COVID-19 webpage. It also contains links to translated versions.

HSE Advice

List of all HSE Coronavirus guidance: <u>Link</u> Plus HSE documents: <u>Link & Link</u> Making your workplace COVID- secure during the coronavirus pandemic - <u>Link</u>

NHS Advice

Covid-19 National Testing Programme – schools and colleges handbook: Link

ACAS Advice

ACAS Mental Health at Work During Coronavirus guidance: <u>Link</u> <u>ACAS Working safely during Coronavirus - Link</u> <u>ACAS Working from home during the Coronavirus Pandemic - Link</u> ACAS Coronavirus - Shielding and Vulnerable People -<u>Link</u> ACAS – Sick Pay for self-isolation during Coronavirus -<u>Link</u>

SCHOOL OPERATIONS	
	Action by Whom/ When/ Done

Transmissibility of Virus	 Staff will wear a face covering in shared communal areas such as corridors, staffroom, offices when people other than the occupants enter and at the beginning and end of the school day. Parents and Visitors to the site will wear a face covering at all times Staggered starts to the school pick up and drop off Limits on numbers in shared offices Social distancing Site closed to non invited visitors and non-essential visitors 	January 2022 RA
Equality	 All staff, working in all areas of the school, will be treated fairly and equally. This risk assessment will apply to all staff equality regardless of which phase of the school they may work with. 	January 2022 RA
ANY LOCKDOWN/ CLOSURE OF SCHOOL	 The school will close and only be open to the children of critical workers and children who are vulnerable. Staff will work from home except if they are supporting in school classes SLT - will be in school Family Support Workers will be in school Office staff will work in school as normal Critical worker places will be given to households where both adults in the household are key workers as a priority Where there is a single adult they will be given priority Critical Worker places when one household member out of two is a key worker will be allocated only if there is space Proof of employment as a key worker will need to be provided The school will make contact with all families where a child is in receipt of an EHCP and will discuss with them, the best way the needs of their child can be supported during this time. This may be in school but it may be at home. If a parent feels that it is best for their child to have a place, they will be offered a place. Children who have a social worker will be offered a place. Children who are looked after or adopted from care will be offered places but this will be discussed with the carer to ensure the needs of the child can be best met in school or at home. All Health and Safety, measures as laid out in this document unless superseded by this lockdown statement will apply. 	January 2022 RA

Access/Egress of school building	 Children will be taught in classes of 30 children. Children will be in Phased Bubbles outside (e.g. Reception and Nursery, Year 3 and 4, Year 1 and 2 and Year 5 and 6) Adults will mix between bubbles to ensure cover and specialist teaching can be delivered Children accessing the part-time POD specialist provision at Grove will continue to do so. Encourage older children to keep their distance from each other and staff where possible. At least 1 window will remain open in every classroom, activity space or office Only one adult should come to the school site with a household group of children. All other adults should remain away from the exterior or the school. Adults on school site should wear a mask At Grove, the one-way system should be used. Adults working in school are encouraged to wear a face covering at all times. 	January 2022 RA
Classroom	 Children will be kept in classes. The use of Phased bubbles will be used for Maths and phonics setting. At Grove 45 Reception, children will be taught as one bubble. No mixing between phased bubbles. Staff providing emergency and PPA cover across bubbles will ensure they wash their hands before entering the classroom area. Tables no longer need to face forward. Plans in place to offer remote education to pupils who are self-isolating. Google Classroom will be used for remote education and children self-isolating. Wherever possible, they will be using outside doors to access playground and enter and exit classrooms The staffroom can be used for lunch breaks along with the ICT suite and Key Stage areas. 	January 2022 RA
School Reception/Offi ce	 Parents are encouraged to contact the office by telephone or email Two parents at any one time in the office area. Glass panels at the school office. Hand gel Face masks Electric sensor doors 	January 2022 RA
Unused rooms	All Rooms will be in use	January 2022

Administration	 All staff working in offices will wipe and clean surfaces and telephones before leaving the workstation. 	RA January
	Window to be pen at all times.	2022 RA/LC
Stairs	No stairs	
Lifts	No lift	
Visitors	 Only essential visitors to be permitted to the building All visitors must wear face masks 	January 2022
		RA/LC
Staffroom	 Staff may use the staffroom Staff can also eat in the ICT Suites and the Key Stage areas. Wipes will be available in the rooms and they will be asked to wipe down surfaces after they have 	January 2022
	 wipes will be available in the rooms and they will be asked to wipe down surfaces after they have touched them 	RA/LC
Playground areas	Outside play equipment can be used as normalAll children to use the playground	January 2022
		RA/LC
Off Site visits and visits to	 Visitors and visits should always be pre announced and in the diary and by appointment only. Visitors should follow the school risk assessment School staff and children should adhere to risk assessments at the venue they are attending 	January 2022
sites	• School stall and children should adhere to hisk assessments at the vehice they are attending	RA/LC
Assemblies	Assemblies will continue on line	January 2022
		RA/LC

Toilets	Toilets will be used as normal.	January 2022
		RA/LC
Fire Exits	Fire exits will be used as normal	January 2022
		RA/LC
People in Shielded group	 Shielding advice paused in April 2021 All children should attend school 	January 2022
9.000		RA/LC
Isolation Room/Medical Room	 The Medical room will be used for anyone who is unwell. The SEND office will be used as an overspill facility 	January 2022
		RA/LC
Attendance and Isolation	People who are fully vaccinated, or children and young people aged between 5 and 18 years and 6 months, identified as a close contact of someone with COVID-19, should take an LFD test every day for seven days and continue to attend their setting as normal, unless they have a positive test result or develop symptoms at	January 2022
	any time.	RA/LC
	Unvaccinated adults must continue to self-isolate for 10 days if they are identified as a contact of someone with COVID-19.	
	Children under 5 are not being advised to take part in daily testing of close contacts. If a child under 5 is a contact of a confirmed case, they are not required to self-isolate and should not start daily testing. If they live in the same household as someone with COVID-19, they should limit their contact with anyone who is at higher risk of severe illness if infected with COVID-19, and arrange to take a PCR test as soon as possible. They can continue to attend an education or childcare setting while waiting for the PCR result.	
	If somebody has tested positive within the last 90 days, they are strongly encouraged to take part in lateral flow testing after their isolation period.	

	 School attendance continues to be mandatory for all children. Usual attendance rules will apply please see the Attendance Policy on our website. Parents' duty to ensure that their child attends regularly at school where the child is a registered pupil at school, and they are of compulsory school age. The office will record attendance and follow up absences each day to ensure the safety and well-being of our children. School will issue sanctions, including fixed penalty notices in line with local authorities' codes of conduct for non-attendance. Children who are non-compulsory school age will continue to be monitored and have our procedures applied. Any family that does not engage with School or the Educational Welfare Officer regarding attendances will be referred to Suffolk County Council's Child and Young People's Services. Anybody wishing to apply for Leave of Absence should apply using the new online portal. 	
Communicatio n	 Via ParentMail and Facebook. Telephone calls if needed Parents can email staff directly or can contact staff through the school office. 	January 2022
	 The school may provide information to be acted upon at very short notice and over holidays, bank holidays and weekends. 	RA/LC
Safeguarding policy	The Safeguarding policy is available on the school website.It is operational.	January 2022
		RA/LC
DSL	DSLs are available throughout the school dayAll training is up to date.	January 2022
		RA/LC
Kitchen	The kitchen is open and operational.	January 2022
		RA/LC

Dining Hall	 Children eat in the dining hall in phases. Tables are wiped down in between sittings. 	January 2022
		RA/LC
Kitchen cupboards	 Food storage cupboards should be checked as part of normal practice 	January 2022
		RA/LC
Breakfast Club	 Breakfast Club is open as normal It is fully operational 	January 2022
		RA/LC
Deep Clean	 Daily clean at the end of the day PPE will be worn by cleaning staff 	January 2022
		RA/LC
Cleaners	Cleaners will work as normal.	January 2022
		RA/LC
Frequent Cleaning	More frequent cleaning procedures put in place across the site, particularly in communal areas and at touch points including:	January 2022
	Taps and washing facilities, Toilet flush and seats, Door handles and push plates especially entrance doors, Handrails on staircases and corridors, Lift and hoist controls, Machinery and equipment controls, All areas used for eating must be thoroughly cleaned at the end of each break, including chairs, door handles, vending machines and payment devices, Telephone equipment	RA/LC
	Keyboards, photocopiers and other office equipment, classroom desks and chairs.	

	Cleaners will remain in their assigned areas to reduce the risk of cross contamination.	
Emptying Bins	 Staff to ensure they wear protective gloves and or wash hands immediately after emptying bins. 	January 2022
		RA/LC
COSHH	Ensure the COSHH risk assessment for cleaning/caretaker activities has identified the correct process and PPE to be worn.	January 2022
	 All chemicals ordered are under the COSHH Risk Assessment sheet. As Trust guidance, PPE is not being insisted upon, but staff can access a visor, googles, apron, gloves and paper facemask via school if they want. 	RA/LC
Uniforms	 Uniforms will be worn everyday 	January 2022
		RA/LC
Lettings	 Letting will continue and the school risk assessment will be shared. The company letting the hall should also share their risk assessment with the school. 	January 2022
		RA/LC
Property Concerns	 All serious property concerns have been raised with the schools Property Management Adviser and appropriate steps are in place to ensure the safety of all building occupants. 	January 2022
		RA/LC
Regular Compliance Checks	 Relevant property statutory compliance checks have been completed and records updated. Daily and weekly checks have been reinstated and pre-opening checklist completed. All usual pre-term building checks will be undertaken to make the schools safe. 	January 2022
		RA/LC
Risk Assessments	 All <u>contractors</u> must provide a suitable and sufficient risk assessment for the activities they carry out which must <u>include</u> covid<u>-19</u>. 	January 2022

	 School requires all contractors to comply with its Health and Safety procedures and processes. All planned/reactive maintenance to be carried out during out of hours unless seen as an emergency. Develop back up plans in case a key supplier/contractor fails to deliver at short notice as it cannot be predicted when COVID-19 might strike their workplace – JR to coordinate at Active Learning Trust. All contractors to comply with the health and safety procedures in school. 	RA/LC
Maintenance	 Usual procedures to continue. Planned/reactive maintenance to be carried out during out of hours unless seen as an emergency. 	January 2022 RA/LC
Water check	 Buildings have been open throughout and all checks for Legionnaires' disease have been taking place as usual. 	January 2022 RA/LC
PEEPS	 Personal Emergency Evacuation Plans (PEEPs) continue to be in place for those staff that continue to work in the school and any pupils that access the school site, which should include lifts. 	January 2022 RA/LC
Emergency Escapes	Emergency escape routes / doors are fully operational and kept clear	January 2022 RA/LC
Fire Alarm	 Reminders issued to staff and pupils that if the fire alarm is activated that they must still keep 2m distancing from the next class when at the evacuation point. 	January 2022 RA/LC
Fire Drill	Fire drill each half term.	January 2022 RA/LC

Guidance	 Emergency evacuation to form part of the staff handbook for reopening. Online training with all staff Include this in guidance pack for each school for staff members. Policy updated, amended, and shared in COVID-19 area on website. Check if the evacuation procedure needs to be changed and communicate the new procedure to students and staff 	January 2022 RA/LC
First Aid Cover	 All qualified staff to resume first aid duties. Full PPE is available for staff who are administering first aid. Grab PPE kits are available around school for all staff and visitors to use. All online First aid qualifications that were taken in the summer will receive face-to-face training on the 1st September. Full PPE must be worn in the event of intimate care or a suspected COVID-19 case. 	January 2022 RA/LC
First Aid Facilities	 Checked daily by the Site Manager and recorded on Handsam. Access to first aid facilities is maintained and the school suitably stocked with first aid sundries. Site Manager to make half-termly Medical Book checks. 	January 2022 RA/LC
Medical Needs	 Parents have been asked to inform of any new health conditions. Any new needs to be assessed and supported implemented as needed. Staff or pupils with medical needs have been assessed and relevant consents are in place. 	January 2022 RA/LC
Use of Medications	 Staff have been trained in the use of medications and increased level of control applied, to include the use of PPE if required. 	January 2022 RA/LC
Medical and First Aid Policies	 First Aid policy reviewed to include consideration of the risk of infection of covid-19. 	January 2022 RA/LC
Hygiene - Access/Egre ss of school	 Wipes and sanitiser available at both sides of doors. All staff, children and visitors will use hand sanitizer before and entry to the school site. Children and staff to follow the government advice about handwashing. 	January 2022

building	 Handwashing posters to be visible in every room – (DFE posters shared with schools) 	RA/LC
Lateral Flow Testing	 All staff are asked to complete 2 lateral flow tests per week – Sunday night and Wednesday night. Results to be reported via the school's website to the school and DFE. All lateral flow testing must be reported – if a positive lateral flow test a full test should be booked and the 	January 2022
	member of staff not return to work.	RA/LC
Face Coverings	 Face coverings must be worn in school by staff and visitors. Children of primary age do not need to wear a face covering. 	January 2022
		RA/LC
Soap/Warm Water	 School will have a suitable supply of soap, access to warm water for washing hands and hand sanitiser. Appropriate controls are in place to ensure the suitable sanitisation of pupil's hands following breaks 	January 2022
	 Appropriate controls are in place to ensure the suitable samitisation of pupil's nands following breaks before meals and following the use of toilets. Children will be taught and reminded of good handwashing practice. Trust's comment on the last page of the risk assessment is that people should wash their hands with soap and water often – do this for at least 20 seconds. The 20 second washing rule will be applied, supervised, and monitored - and posters displayed of this requirement ((children, staff and disabled and visitor toilets) • Checks and procedures to continue. An adult will give hand sanitiser to our youngest children in Phase 1. Children who have an allergy may bring in their own hand sanitiser. 	
Sanitisation	 Supplies of anti-bac gel to be used where hand washing is not practical. Hygiene routines to be shared with children prior to returning to school and reinforced on their arrival and continually. 	January 2022
	 Checks and procedures to continue. Hygiene procedures to be embedded with new children and families. Children eating in classrooms will continue to clean their tables before and after they eat. Additional cleaning will take place throughout the day. 	RA/LC
PPE Need	 The full curriculum offer will be provided to the children. Teachers will use the timetable to suit the needs of the children in their class. Mental health and well-being will remain the priority of the school upon return in the autumn term. 	January 2022
		RA/LC

 The full curriculum offer to all year groups. Additional Catch up support and Tutoring will be offered to children as identified by the school. 	January 2022
	RA/LC
 The full curriculum offer will be provided to the children. Teachers will use the timetable to suit the needs of the children in their class. Mental health and well-being will remain the priority of the school upon return in the autumn term. 	January 2022
	RA/LC
 The needs to children will inform curriculum planning. Teachers will identify gaps in children knowledge and will plan accordingly. 	January 2022
 New children in Reception / Nursery will participate in the baseline as well as origoing assessment by school staff to ensure children settle quickly. Teaching staff to use online platforms to set homework. Catch up funding will be used to support children who have gaps in their learning. The new extended schools provision paid by the top up funding will support children who are identified as at risk. 	RA/LC
All practical sessions will resume to full effect.	January 2022
	RA/LC
 Music lessons will resume to full effect in the autumn term. Music lessons to take place in outside where possible or in the library. Singing assemblies will resume in the autumn term for phase groups. 	January 2022
	RA/LC
 PE guidance will be taken from the DfE "how sport/P.E. can be taught safely according to the guidance". The full entitlement to the PE curriculum will continue, including access to tournaments. 	January 2022
	RA/LC
Please see Remote Learning Policy and Remote Learning Procedures	January 2022
	 Additional Catch up support and Tutoring will be offered to children as identified by the school. The full curriculum offer will be provided to the children. Teachers will use the timetable to suit the needs of the children in their class. Mental health and well-being will remain the priority of the school upon return in the autumn term. The needs to children will inform curriculum planning. Teachers will identify gaps in children knowledge and will plan accordingly. New children in Reception / Nursery will participate in the baseline as well as ongoing assessment by school staff to ensure children settle quickly. Teaching staff to use online platforms to set homework. Catch up funding will be used to support children who have gaps in their learning. The new extended schools provision paid by the top up funding will support children who are identified as at risk. All practical sessions will resume to full effect. Music lessons will resume to full effect in the autumn term. Music lessons will resume to full effect in the autumn term. Music lessons will resume to full effect in the autumn term. Music lessons will resume to full effect in the autumn term for phase groups. PE guidance will be taken from the DfE "how sport/P.E. can be taght safely according to the guidance". The full entitlement to the PE curriculum will continue, including access to tournaments.

		RA/LC
RSE	This will be taught and reviewed in the summer term.	January 2022
		RA/LC
School Fixtures	Fixtures will continue to take place.	January 2022
		RA/LC
Behaviour	 Behaviour policy will be amended in line with government guidelines, shared with all staff, families, and loaded to the school's website. Discussions will take place with all children. 	January 2022
	 Class behaviour contracts and expectations will be shared with all children 	RA/LC
Pastoral Care	Pastoral Provision will continue.Teaching assistants to support children as the universal offer.	January 2022
		RA/LC
Mental Health Issues	 Teaching Assistants to implement their specialist training to support children and adults. Clear systems in place for school staff to gain support if needed. 	January 2022
	 Regular staff meetings and contact to minimise anxiety. All children will have equal access to provision at school. This will be prioritised through the needs of the children. Phase 1 children will have equal access to all areas of learning inside and outside. Mental health provision will be a priority of the school 	RA/LC
Ofsted Inspection	Ofsted inspections are outlined on the Ofsted.gov.uk website	January 2022
		RA/LC

Governance	 Local Governing Body Meetings will continue to be online This will be reviewed before the December meeting. Governors will continue to monitor the schools progress in face-to-face discussions and in school monitoring. Meeting dates have been published online. Minutes to be updated on the school's website. 	January 2022 RA/LC
Primary Assessment	 Statutory primary assessments will take place in summer 2022 – all usual assessment procedures will continue. Year 2 children will take a past Phonics Assessment in December 2021. Internal assessment will take place as per the School Assessment Calendar – 2021/2022 and ALT calendar. 	January 2022 RA/LC
Contact Tracing	 Schools must ensure that staff members and parents/carers understand that they will need to be ready and willing to: 	January 2022
	• <u>Book a test if they are displaying symptoms</u> . Staff and pupils must not come into the school if they have symptoms and must be sent home to self-isolate if they develop them in school. All children can be tested, including children under 5, but children aged 11 and under will need to be helped by their parents/carers if using a home testing kit	RA/LC
	• From 16 August, if you double vaccinated and are a contact of someone who has COVID-19 and you are fully vaccinated, or aged under 18 years 6 months, you will not be required to self-isolate for 10 days from the first symptoms. There is further information in the <u>Household contacts who are not required to self-isolate</u> section. Staff are expected to attend work unless they are unwell.	
	The school will report single cases to the LA and office at ALT and will request LA support if cases increase rapidly if there is 5 or more cases or a hospitalisation.	
	 Parents and staff must inform Mr Payne if a test has come back positive with Covid-19. Staff and parents will be informed if there is a positive case of Covid 	
System in place for isolating children who develop symptoms during the	 A member of SLT will manage and coordinate the provision. Child who is unwell will use the First Aid Room. Adult to remain two meters away. If the child / adult needs to use the bathroom – they use the accessible toilet. A deep clean will the take place before the conference room can be used again. PPE to be used for all staff dealing with the child or adult. 	January 2022 RA/LC January 2022

day, while they wait to be picked up		RA/LC
Stay Away	 Pupils, staff and other adults MUST not come into the school if they have <u>coronavirus (COVID-19)</u> <u>symptoms.</u> If you develop symptoms of COVID-19, stay at home and self-isolate immediately. If you have a positive test result but do not have <u>symptoms</u>, stay at home and self-isolate as soon as you receive the results. The isolation period starts immediately from when the symptoms started, or, if you do not have any symptoms, from when your PCR test was taken. Your isolation period includes the day your symptoms started (or the day your test was taken if you do not have symptoms), and the next 10 full days. In the event of a negative PCR test, the pupil or member of staff may resume daily activities as normal. Continue current procedures In staff handbook and in letters to parents. 	January 2022 RA/LC
Local Outbreak	 In the event of a local outbreak, the Public Health England's protection team or local authority may advise a school or number of schools to control transmission – we will take further guidance and be directed as necessary. 	January 2022 RA/LC
Multiple Staff ill	 An assessment will take place to ensure that there is enough staff to safely run the school. Plans will be in consultation with the Active Learning trusty and local North Hub of Schools. In the event of a core, senior leader is unwell; a member of the senior leadership team will cover. 	January 2022 RA/LC
Awareness	 Ensure all parents/carers and staff are aware of reporting requirements etc. 	January 2022 RA/LC
EHCP Plans	 EHC Plans will be monitored by a member of the core senior leadership team if RC becomes unwell. Active Learning Trust to offer support if necessary, 	January 2022 RA/LC