

Action protocol
in relation to the Coronavirus COVID-19
in the scope of health and safety

22/23 Academic year

Rev. 7/ 27th July 2022

HISTORY OF MODIFICATIONS

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1. Introduction

This document aims to establish a basic Action Protocol for the academic year 22/23 for MGEP workers and students, considering **health and safety aspects** in relation to the SARS-CoV-2 coronavirus, which causes the disease known as COVID-19. It includes general measures that must be adapted to the particularities of each organisational unit and work centre. Its purpose is the development of educational activity always from the prevention of the spread of COVID-19 in the educational community, that is, to guarantee access to a quality fact to face education of our students in conditions of safety and health, both for staff MGEP as for its students.

It has been drawn up on the basis of the main documents produced by the various administrations and the experience at MGEP in the last two and a half years.

It appeals to the responsibility of each person in the fulfilment of individual objectives of this Protocol since the joint action of our organisation and the people who are part of it, will generate an effective action in the fight against COVID-19.

The people who have participated in its preparation belong to the **Health and Safety Committee and the Crisis Cabinet** established for the occasion and is composed of Jose Luis Larrabe (Head of Prevention), Joseba Jauregi and Andoni Orrantia (Prevention Technicians), Fernando Garramiola, Manex Arrieta, and Angel Gallo (Prevention Delegates), Mila Arregi (Administration and Finance Coordinator), Patxi Makazaga (Building Management Coordinator), Nekane Errasti (Engineering Coordinator), Gorka Aretxaga (Vocational Education Coordinator), Xabier Sagarna (Electronics and Information Technology Coordinator) and Carlos García (General Coordinator). Jose Luis Larrabe and Carlos García are the two reference persons of MGEP for aspects related to COVID-19 (and link with Osakidetza).

This document only contains guidelines to be followed if the conditions and guidelines of the administrations remain the same or change slightly during the academic year, and remains dynamic in case adaptations are needed at any time.

2. Objectives and Scope

The objectives of this protocol are the implementation of measures to ensure the health of the people who carry out their activities at MGEP (students, scholarship holders, workers, and subcontractors), the control of the spread of the virus, and the monitoring of the social measures that the authorities recommend or establish.

It is aimed to anybody who comes to MGEP facilities or who is going to carry out work in other companies. These people are required to follow strictly the instructions set out in the protocol below. In this sense:

- All contracted companies/freelancers who work in our facilities will carry out their work once the Coordination of Business Activities (CAE) has been completed.
- External professors (Mondragon Lingua, Ardatz, Somorrostro...) that develop programmed activities in whatever MGEP campus, must follow this protocol.
- External personnel and visitors (clients, suppliers in commercial activities, professional members of the defence juries for End-of-Course or End-of-Master's projects or similar events, attendees at open conferences, etc.) will be subject to the same [basic measures](#) and [protection](#) as provided in this protocol.

3. Coronavirus risk assessment

In the activities of MGEP, no risk scenarios of professional contagion to SARS-CoV-2 are identified for jobs without direct attention to the public, at a safety distance, or with collective protection measures that prevent contact, as indicated in the risk identification and elimination section of this protocol. Consequently, the preventive measures are oriented to a scenario in which persons who carry out their activity at MGEP have a low probability of exposure to risk (work environment in which the safety distance is kept or collective protection measures are in place to prevent contact).

3.1. Hazard identification and elimination

The agent colloquially known as "Coronavirus" is a biological agent baptised as SARS-CoV-2, which causes the COVID-19 disease.

According to information from the Ministry of Health, with the accumulated scientific evidence, it is considered that SARS-CoV-2 can be transmitted by close contact person-to-person by different routes, the main route is inhalation and contact of respiratory aerosols or larger particles emitted by a sick person with the upper and lower respiratory tract of a susceptible person.

The risk of spread of SARS-CoV-2 increases the more people interact with each other and the longer the interaction lasts.

It has also been shown that there is greater transmission over short distances, in enclosed and crowded spaces, when there is no good ventilation and without adequate prevention measures.

According to the Labour Inspection Criteria¹, the activity we carry out at MGEP is not considered as an activity of exposure to the risk of coronavirus, as it does not comprise a health or social health activity, so the RD for biological agents does not apply.

The risk identification and elimination measures established in this protocol are intended to ensure that the exposure scenario for all jobs qualify as **LOW PROBABILITY OF EXPOSURE**.

The following are identified as a source of danger:

- Jobs, tasks and activities that are carried out among people at a less distance than the safety distance.

The actions to be carried out are those contained in the following paragraphs:

3.1.1. Persons with symptoms or positive diagnosis

- If a worker or student begins to present symptoms compatible with the disease, the guidelines in Osakidetza web must be followed <https://www.euskadi.eus/como-actuo/web01-a2korona/es/#9400>.
- Until obtaining the diagnostic result of the case, no action on contacts will be indicated, and the teaching activity will continue as normal, with extreme hygiene measures.
- In case of a positive result in the Covid diagnosis, if the worker has mild symptoms that do not require sick leave, the worker should wear an FFP2 mask for the days indicated by Osakidetza. In the case of workers, whenever possible, teleworking is recommended. In addition, they should inform the area coordinator and the department coordinator. In the case of students, the procedure to follow lessons online and the procedure to ask for it is indicated in the academic regulations. Continuous training students should inform the person in charge of the continuous training course.

3.1.2. Measures to reduce the effects of face-to-face interaction

- Cases in which the use of masks is recommended:
 - In workers, when safety distance or adequate ventilation cannot be guaranteed, a surgical mask is recommended.
 - In vulnerable people, in any situation where there is prolonged contact with people at less than a safe distance. In this case the use of FFP2 is recommended.
 - In people giving face to face customer service, when this safety distance cannot be guaranteed or when there is no protective screen.

³ Criteria of the Labour and Social Security Inspection regarding situations derived from the new Coronavirus.

- The use of the mask is free for any person and in any situation, and this personal choice must be respected.
- It is mandatory to respect the seating capacity of the rooms (meeting rooms, social facilities, etc.). The capacity refers to the number of posts, seats that can be occupied in a room and it is indicated at the entrance of each room.
- A safety distance or the use of masks will be required in face-to-face meetings.
- Social premises are kept open with a reduction in capacity to guarantee the safety distance. Each person is responsible for cleaning the site that has used.
- Smoking may not be allowed across the MGEP premises except in the outdoor areas designated for this purpose and ensuring a safety distance.
- In face to face customer service situations, the safety distance between workers and the public must be kept.

3.1.3. Staff management vulnerable to risk due to COVID-19

A particularly sensitive working person is understood to be one who has a known biological state due to previous pathologies, medication, immune disorders, or pregnancy.

The Ministry of Health has defined as vulnerable groups for COVID-19 people with cardiovascular disease, including high blood pressure, chronic lung disease, diabetes, chronic kidney failure, immunosuppression, cancer in the active treatment phase, severe chronic liver disease, morbid obesity (BMI > 40), pregnancy, and being over 60 years².

The staff of the Health Surveillance Service will evaluate the presence of people who meet the criteria of workers who are especially vulnerable to coronavirus and will issue a report on the necessary measures for prevention, adaptation, and protection. The person's Coordinator Department will carry out the adaptation or change of job position to adapt it to the necessary conditions or the change of activities always following the instructions of Osakidetza and Osalan.

The estimated duration of this withdrawal process will be in accordance with the duration that is determined at each moment for the state of health alarm and will cover, as a maximum, its duration. Discharge may be issued before said completion, when the Prevention Service Physician issues a new report indicating that the situation of temporary disability must end, due to changes in working conditions or adjustments derived from the application of updates to the procedures published by the health authorities.

² Technical document: Risk assessment of SARS-CoV-2 transmission by aerosols. Prevention measures and recommendations.

Students diagnosed as especially sensitive should inform their Semester Coordinator or Tutor to adapt, as far as possible, the learning process.

3.2. Organisational Measures

The organisational measures implemented by MGEP are:

- [Identification and elimination of sources of danger](#) and [risk assessment](#).
- Preparation of this Protocol and communication to the entire group of workers.
- Differential treatment for people vulnerable to risk from COVID-19.
- Acquisition and provision of hygienic masks. [See the Using Personal Protection section](#). Masks available for workers at each campus Reception.
- Delivery of a mask (and other PPE, where necessary).
- Increased air renewal in all workspaces whenever possible, either naturally or forced, and increased filter cleaning.
- Acquisition and use of devices to monitor indirectly (through systematic CO2 measurements) air quality and ventilation efficiency in classrooms and departments.
- As a general criterion, teaching activities will return to the pre-pandemic situation, respecting the capacity and, as far as possible, the safety distance and ensuring the ventilation of the spaces. Priority will be given to face to face attendance in all academic activities. There will not be a break as such between classes, the duration of classes will be reduced to 55', leaving 5' for ventilation.

3.2.1. Possibilities of developing activities in a remote manner

People considered vulnerable to the Covid will follow the indications of the company doctor with regard to face-to-face work. It is necessary to inform the Department Coordinator.

3.2.2. Work or internship in other companies

Both MGEP workers and students must ask the receiving company its COVID-19 protocol in order to follow its instructions. In case of an incidence due to Covid (quarantine, isolation for being suspicious or positive), both workers and students must inform MGEP following the instructions in this protocol.

3.3. Preventive Measures

The following basic preventive measures are applicable to all MGEP people, as well as outsiders who, under authorisation, may access our facilities:

- Workers and visitors must respect the current interpersonal distancing recommendations.

It is important to wash your hands often.

- When coughing or sneezing, cover your mouth and nose with a bent elbow.
- In face-to-face meetings, the capacity of the room must be respected and also the mandatory safety distance.
- It is necessary to make sure that all rooms are aired (classrooms, departments, dining rooms, meeting rooms, etc). If there are windows, they must be in tilt and turn position, or if this is not possible window must be opened for 5 minutes every hour.
- When it is necessary to carry out a PDIA test to access a certain country, it is necessary to contact the MGEP Prevention Service so that the test can be managed through Osarten (please note that the test results take about 24 hours).
- In the event that a worker or student at MGEP detects a potential risk situation that must be corrected, they should inform the reference person, responsible for prevention, José Luis Larrabe (620 978 779), so that he can make an assessment and take additional actions.

3.4. Emergency Management

The emergency management system is modified, that is, if the emergency signal is activated, all the personnel located at the MGEP facilities at that time will leave the building to gather at the meeting place designated in the self-protection plan, maintaining as far as possible the interpersonal safety distance and wearing a mask. In case of emergency, the established evacuation routes must be followed, ignoring the routes marked in each building due to COVID-19.

3.5. Specificities for Orona Ideo, AsFabrik and Goierri

On the Orona Ideo, AsFabrik and Goierri campus, the guidelines established by the responsible entity must be followed.

4. Data protection

The processing of personal data, even in health emergency situations, must continue to be treated in accordance with the regulations for personal data protection (RGPD and Organic Act 3/2018 on the Personal Data Protection and guarantee of digital rights). These regulations have provided for this eventuality of health emergency, so its principles apply to it, including the treatment of personal data with lawfulness, loyalty and transparency, limitation of the purpose (in this case, safeguarding the interests of the people in this pandemic situation), the principle of accuracy, and the principle of data minimisation. Regarding the latter, the data processed must

be exclusively limited to those necessary for the intended purpose, without said treatment being extended to other personal data not strictly necessary for said purpose.