

# TDSB Mask Guidelines

September 9, 2020

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These guidelines have been developed to address our collective responsibility to follow public health and Ministry of Education advice to implement measures known to be effective in combatting the transmission of COVID-19. Unless an exemption applies that would allow a student, staff or visitor to attend in person without a mask, the wearing of appropriate masks is mandatory at a TDSB school or building.

This document provides guidance to staff, visitors, parents and students on the TDSB's mask policy, including information about exemptions.

## Background

To protect our health and safety, all students, staff and visitors will be required to wear masks in TDSB schools, buildings and on school buses.

**Staff and visitors** must wear [Level 1 or 2 medical masks](#) at all times when indoors, and outdoors when unable to maintain a physical distance of two metres/six feet. Level 1 and 2 medical masks provide [low to moderate barrier protection from aerosols, sprays and fluids, and are appropriate for general use](#).

**Students** must wear non-medical masks or face coverings while in school.

The TDSB's requirements are consistent with the [City of Toronto requirement](#) that anyone aged two years and older must wear a mask/face covering in indoor public spaces, with possible exemptions. Toronto Public Health [recommends](#) that all students wear a mask/face covering while indoors at school. The requirement for all school board staff to wear medical masks follows the direction of the Ministry of Education.

For the purpose of this document, masks and face coverings will be collectively referred to as "masks", and reference to "parents" includes guardians.

## Mask Use, Supply and Care

Parents are encouraged to provide masks for their children; however, schools, administrative buildings and buses will be equipped with extra masks.

Staff may place orders for masks and other Personal Protective Equipment (PPE) directly through the TDSB Distribution Centre [online catalogue](#) and processed through SAP. For questions, please contact 416-397-2766 or email [DC@tdsb.on.ca](mailto:DC@tdsb.on.ca). Please do not purchase masks/PPE from other vendors unless approved by the TDSB.

Students and staff should bring either paper bags, breathable cloth bags, fanny packs, or ziplock bags to store clean and dirty masks (separately) during mask breaks, recess, or when not wearing a mask. Plastic bags are not recommended unless needed for short periods of time.

## Mask Breaks

During the school day, staff will allocate time for students and themselves to have mask breaks, including outdoor time (if possible) where masks can be temporarily and safely removed and stored.

Staff who work from administrative sites should speak with their managers regarding the scheduling of breaks when masks may be temporarily removed.

## Types of Masks

There are commonly three types of masks:

## **Disposable**

Disposable masks are available in drug stores and many retail outlets, or can be ordered online. They are 3-layered, with stretchable elastic ear loops. After wearing for a day, these masks/face coverings should be discarded and not used again. Non-medical or medical versions of these masks are appropriate.

## **Reusable**

Reusable masks look very similar to disposable masks but are made from cloth material that provides protection. Reusable masks can be used daily but do need to be washed in hot water frequently. They can also be purchased at many retail outlets or ordered online, however the quality of these masks may vary.

## **Reusable Homemade**

You can also make masks from household or purchased fabric/materials. For instructions on making masks using fabric, visit the [Government of Canada website](#). Note: Homemade masks and materials are not tested against any standards and may not be as effective in blocking virus particles that may be transmitted by coughing or sneezing.

## **Clear Face Masks**

People who are D/deaf, hard of hearing, have autism spectrum disorder (ASD) and other developmental disabilities, and people for whom English is an additional language may rely on seeing the whole face for communication.

People with ASD and other developmental issues rely on being able to see the whole face in order to interpret language and understand communication, and may be unable to identify a person even from a minor appearance change, such as wearing a mask/face-covering. TDSB staff working with these individuals may wear clear face masks when working with students and use medical masks otherwise. These masks are provided by the TDSB.

## **Qualities of a Good Cloth Mask or Face Covering**

A good cloth mask should:

- Be at least two layers of tightly woven cotton or linen.
- Cover over nose, mouth and chin, and be easy to breathe through.
- Fit securely to the head with ties or ear loops without gaping or impairing vision.
- Be comfortable to avoid the need for adjustments when wearing.
- Maintain their shape after washing and drying.
- Not contain non-breathable materials such as plastic.

Proper Use of a Mask:

- Do not share your mask with others.
- Wash your hands before putting on and after taking off a mask.
- Place the mask over your nose, mouth and chin.

- Avoid touching your face and mask while using it.
- Change your mask as soon as it is moist or dirty.
- For disposable masks, discard and do not use again after wearing for a day.
- Do not leave your mask tucked under your chin, hanging from your ear, or on your forehead.
- Remove the mask by the ear loops without touching the front of the mask.
- For reusable cloth masks, put in a bag or directly in the laundry bin to be washed after use.
- Launder cloth masks with other items using the hot cycle and dryer or follow the care instructions provided by the manufacturer.

### Use of Face Shields as an Alternative to Masks

- A face shield features a looser fit and transparency, but is not an alternative to a mask. When used alone, face shields are not as effective as masks/face coverings. However, face shields can be considered for use only in certain circumstances (e.g., when masks are short supply, when wearing masks interferes with speech clarity, for those impacted by heat stress, etc.).
- In situations where a student, staff or visitor is not wearing a mask due to an exemption, but would like some additional protection, a face shield may be considered as an alternative measure of protection.

### Other Face Coverings

- Cloth masks or face coverings can be an added public health measure for containing the spread of COVID-19 when they are used in combination with frequent handwashing, physical distancing and staying home when sick.
- Wearing a single layered head covering does not replace a cloth mask. [Hijabs, niqabs and burkas may not be designed to filter respiratory droplets and may not be effective](#). A mask may have to be worn underneath these coverings to ensure the best fit against the face. Make sure the mask fully covers the nose and mouth and fits snugly under the chin, over the bridge of the nose and against the sides of the face.
- Individuals who wear a hijab, niqab and burka may require privacy to put on or remove standard face masks. If appropriate for that person, a mask that fastens over the hijab may need to be made available as an accommodation. If not appropriate, or if unavailable, other forms of accommodation should be considered in conversation with the individual.

### Masks Not Recommended for Use

Some commercially available masks have exhalation (breathable) valves or openings that make the mask more breathable for the person wearing it. However, these masks also allow infectious respiratory droplets to spread outside the mask. Masks with exhalation valves [are therefore not be used](#) because they do not protect others from COVID-19 and do not limit the spread of the virus.

## **Working and Learning at the TDSB**

The following sets out important information about TDSB's mask requirements and exemptions. In addition, please see Appendix "A" Quick Guide for Staff and Appendix "B" Quick Guide for Students.

### **Staff in TDSB Schools and Administrative Buildings/Visitors**

Ministry of Education requires that all school board staff and visitors wear Level 1 or Level 2 medical masks (to be supplied by the TDSB), both indoors and outdoors, unless an exemption applies.

### **Students in TDSB Schools**

Following guidance from the Toronto Public Health and the Ministry of Education, the TDSB requires that all students wear masks while indoors on school property, unless an exemption applies.

The City of Toronto has also produced a helpful fact sheet for parents and students on [Preparing for School during COVID-19](#). Parents and students are encouraged to review this resource and contact their school Principal to address any concerns.

### **Special Masks and Accommodations for Students with Special Needs**

Students with expressive communication difficulties, including those with articulation problems, neurologic issues, and many others, may be disproportionately adversely affected by having to wear a mask at school. In addition, some students may face challenges with the enhanced health and safety protocols in place to help maximize physical distancing. To address these concerns, schools will work with families and Special Education & Inclusion Consultants to [explore strategies to best support students and staff](#) during this time.

Consider using transparent face masks (e.g., no fog clear window masks, Mingle Mask) when working with individuals who are D/deaf, hard of hearing, or may have communication exceptionalities and/or sensory needs who require access to speech reading and/or facial expressions.

Some students are not able to wear masks due to serious medical conditions and are also at high risk for COVID-19. In addition, the conditions at their school (e.g., congregated and integrated sites) and on buses may not enable appropriate physical distancing, good ventilation and other preventative measures. Special care and attention will be given to ensuring adequate staff, drivers, and other supports are in place for these students. Parents are strongly encouraged to work proactively with the school Principal, special education staff, and transportation staff to determine and coordinate safety measures that can be implemented to support these special needs.

Some individuals are able to wear masks, but may not be able to keep the mask on at all times, or whose tolerance may increase or decrease over time. Under these circumstances, accommodation measures should be reviewed and adjusted as necessary.

Special masks and PPE for staff who work with students with special needs are available for order in the TDSB Distribution Centre [online catalogue](#).

### Student Transportation

- [Masks are required \(unless an exemption applies\)](#) for all students and drivers
- Parents should raise any concerns with masks with school staff and [Toronto Student Transportation Group \(TSTG\)](#) staff well in advance
- While waiting for a bus at a bus stop, students and parents should maintain physical distancing where possible
- Drivers will be trained on mask wearing policy and exemptions, and will have a supply of disposable masks on board the buses

### Exemptions from Mask Wearing

Some students, staff and visitors will be exempt from wearing masks in TDSB schools, buildings and while riding on school buses.

**Students, parents and staff must therefore expect that there will be individuals in the school, building, or bus who will not be wearing masks because they qualify for an exemption.**

In such cases, appropriate measures such as greater physical distancing, enhanced cleaning and other infection prevention and control measures will need to be considered. If increased distancing is employed, caution must be exercised so as not to stigmatize the student. The importance of increased distancing may depend upon current epidemiology and vulnerability (e.g., immune issues, etc.) of the student or proximate students.

We expect all staff and students to be respectful of those who cannot wear a mask for medical and other reasons for which an exemption applies.

### The following individuals are exempt from wearing masks:

- Individuals with a medical condition/disability that make it difficult to wear a mask. This can include:
  - Medical condition, mental health condition, cognitive condition or disability that prevents wearing a mask.
  - Medical condition that makes it difficult to breathe.

- People who are D/deaf and hard of hearing or are communicating with a person who is hearing impaired, and where the ability to see the mouth is essential for communication (note: TDSB has ordered different types of clear masks);
- Individuals who are unable to put on or remove masks without assistance; and,
- People who require accommodation in accordance with the *Ontario Human Rights Code*.

If students, staff and visitors are able to wear masks but choose not to, in-person attendance at school or the workplace may not be allowed, however alternative arrangements will need to be considered, such as strict implementation of physical distancing measures, use of other types of PPE, etc. It is expected that all reasonable steps and considerations will be taken before a student is not permitted to attend school in person, or an employee is not permitted to attend work in person.

### Exemption Request Process

Staff, visitors, parents and students who seek an exemption based on one of the above-noted categories must inform the school Principal/manager as soon as possible of the request and exemption category, so that alternative arrangements may be considered.

Staff may also contact the Disability Management Office and review [PR717 Workplace Accommodation for Employees with Disabilities](#) for more information on the disability accommodation process.

When dealing with a mask exemption request, Principals/managers should use the following guidelines:

- The request for exemption should be granted where medical certificate or note supports the request.
- Requests for exemption for medical reasons, where no medical certificate is provided, should be accepted. We assume people are honest and truthful.
- Requests for exemption due to mental health condition, cognitive condition or disability that prevents wearing a mask or face covering should be accepted. Again, we assume people are honest and truthful without having to disclose personal, medical or mental health information.
- Requests for exemption due to inability to breathe: Principals/managers should make reasonable inquiries regarding this request. Are there asthma-related issues? Could a different type of mask be suitable (disposable vs. non disposable, cloth masks or homemade masks)? Although not a substitute for a mask, a face shield may be an option. Face shields provide limited protection but may be better than no mask at all.
- Students/staff who are D/deaf, hard of hearing, communicating with a person who is hearing impaired, or whose ability to see the mouth is essential for communication, should use masks designed for these circumstances.
- Individuals who are unable to put on or remove a mask without assistance may be able to do so with guidance or assistance.



- The procedural duty to accommodate under the Ontario *Human Rights Code* requires that the accommodation process unfold in a transparent, communicative, flexible, respectful, and cooperative manner. Principals/managers should inquire and consider the reasons for the request. For example, is the request being made based on protected grounds of discrimination such as religion or disability? This request may need further assessment by the Principal/manager that may not be able to be undertaken quickly. In such cases, Principals/managers should consult with their Superintendent first, and if necessary, the TDSB Human Rights Office.

### Dealing with Requests for Exemptions at School/Building Entrance

There may be times when exemption requests happen at the entrance to the school or building with no notice. As noted above, some cases may be straightforward, such as cases where a parent/student/staff member seeks a medical exemption.

Requests for exemptions for different reasons, including refusal to wear a mask, may not be easily processed or resolved in a timely manner. Under these circumstances, Principals/managers should take the following steps:

- Respecting physical distancing at all times, have the student (or student with their accompanying parent or staff) wait in an area inside the school/building that has been designated for such situations. In the case of schools, this may be in the Wellness Room. In good weather, offer the option to wait outside the building, provided younger children are with a parent or have supervision.
- Collect all relevant information, including names, contact information and nature of the exemption/accommodation being requested.
- Contact your Superintendent or Manager for assistance in assessing the situation and course of action.

If the request for exemption/accommodation cannot be processed in a reasonable time frame, indicate to the student/parent/staff that more time is needed to process the request and two options are available: continue waiting or return to home for follow-up the next day or as soon as possible.

**It is not recommended that the student proceed to their class or that the employee proceed to their workplace in person during this time.**

### Balancing Rights and Risks

While individuals may choose to assume a reasonable degree of personal risk by not wearing a mask, it is important to understand the impact on the health and safety of others. The risk to public health and safety is an important factor to be considered when dealing with exemption requests or individuals who choose not to wear masks.



School Principals/managers should consider as many options or alternatives as possible to try to maximize the fulfillment of both human rights and the right to a safe working and learning environment.

Teachers and principals are expected to address student non-compliance first with non-disciplinary measures such as reminders, education, parental involvement, and only if necessary, a variety of progressive discipline strategies under [PR585 Board Code of Conduct](#). Should a Principal decide to suspend for non-compliance related to mask wearing and after following the principles of progressive discipline and applying mitigating and other factors, the Principal will use the suspension reason breach of the school or Board code of conduct and connect the suspension to the appropriate sections (e.g., in section 6.2 relating to promoting safety of people in the school, respecting the rights of others, and relating to student responsibilities under section 6.3). By using the “breach” reason the Superintendent will be involved in the suspension process.

### **We'll Get Through This Together**

The use of masks, along with other infection control measures, such as physical distancing, barriers, frequent hand washing, enhanced cleaning, screening, remote working or learning, self-isolation, contact tracing, and testing are key to fighting COVID-19 and ultimately, saving lives.

We understand that returning to work and school at this time is a source of significant stress and anxiety for many staff, parents and students. As a school community, we must work together to prevent the spread of COVID-19 and to maintain a healthy and safe work and learning environment.

**Harassment, bullying, or discrimination of any type against individuals for wearing or not wearing masks will not be tolerated.** Concerns with mask-wearing should be raised with the Principal or Manager. Please do not confront the individual.

School staff should monitor for and address any harassment, bullying, or discrimination that is associated with wearing or not wearing a mask. Staff experiencing harassment, bullying, or discrimination are encouraged to report any incidents to their manager.

### **Sources**

City of Toronto, [COVID-19 Guidance for Use of Face Masks and Coverings by Public](#) (Revised August 26, 2020).

Government of Canada, [Non-medical masks and face coverings: About](#) (Date Modified July 24, 2020).

Public Health Ontario, [Focus on Face Shields for Source Control of COVID-19](#) (July 16, 2020)

City of Toronto, [Preparing for School during COVID-19](#) (August 22, 2020).

Ontario Ministry of Education, [Guide to Reopening Ontario's Schools](#) (Updated August 28, 2020).

Ontario Human Rights Commission, [COVID-19 and Ontario's Human Rights Code – Questions and Answers](#) (Updated August 28, 2020)

Toronto District School Board, [Returning to School: A Guide to the Safe Reopening of the TDSB](#) (August 2020)

Toronto Student Transportation Group, [Transportation and COVID-19](#)

### **Selected TDSB Policies and Procedures**

[P031 Human Rights Policy](#)

[P037 Equity](#)

[P069 Accessibility](#)

[PR505 Parent Concern Protocol](#)

[PR515 Workplace Harassment Prevention and Human Rights](#)

[PR557 Behaviour on Buses](#)

[PR585 Board Code of Conduct](#)

[PR697 Promoting a Positive School Climate](#)

[PR699 Students with Special Needs: Management for Risk of Injury Behaviours](#)

[PR703 Bullying Prevention and Intervention](#)

[PR717 Workplace Accommodation for Employees with Disabilities](#)

Appendix A – Quick Guide for Staff

## DO I HAVE TO WEAR A MASK IF...

I am unable to put on or take off a mask on my own?	No
I have a medical condition that is aggravated by a mask (e.g. eczema, severe breathing difficulties, etc.)?	No
I am receiving accommodation under the Ontario <i>Human Rights Code</i> due to a condition/circumstance that prevents me from wearing a mask?	No
I am drinking water, eating lunch, etc.?	No, masks may be temporarily removed while eating, drinking, or doing an activity that requires temporary removal (e.g., taking oral medication).
I am outside on school property (e.g. parking lot or field)?	No, as long as you are practicing physical distancing.
I am inside the school before or after regular class hours?	Yes
I am in the school hallways?	Yes
I am in the washroom?	Yes
I am in the staff room?	Yes, unless temporarily removing for eating and drinking, with physical distancing.

Learn more about [wearing, removing and storing face masks](#).

**Appendix B – Mask Exemption Quick Guide for Students**

# DO I HAVE TO WEAR A MASK IF...

I am unable to put on or take off a mask on my own?	No
I have a medical condition that is aggravated by a mask (e.g. eczema, severe breathing difficulties, etc.)?	No
I am receiving accommodation under the Ontario <i>Human Rights Code</i> due to a condition/circumstance that prevents me from wearing a mask?	No
I am drinking water, eating lunch, etc.?	No, masks may be temporarily removed while eating, drinking, or doing an activity that requires temporary removal (e.g., taking oral medication)
I am outside (e.g. in the school yard, on the field)?	No, as long as you are practicing physical distancing.
I am seated at my desk during regular class hours?	Yes
I am in the school hallways?	Yes
I am in the washroom?	Yes

- Learn more about [wearing, removing and storing face masks](#).
- School staff will monitor for and address any discrimination, bullying or harassment that is associated with a student either wearing or not wearing a mask. Students and parents are encouraged to report any incidents to the teacher or school principal.