

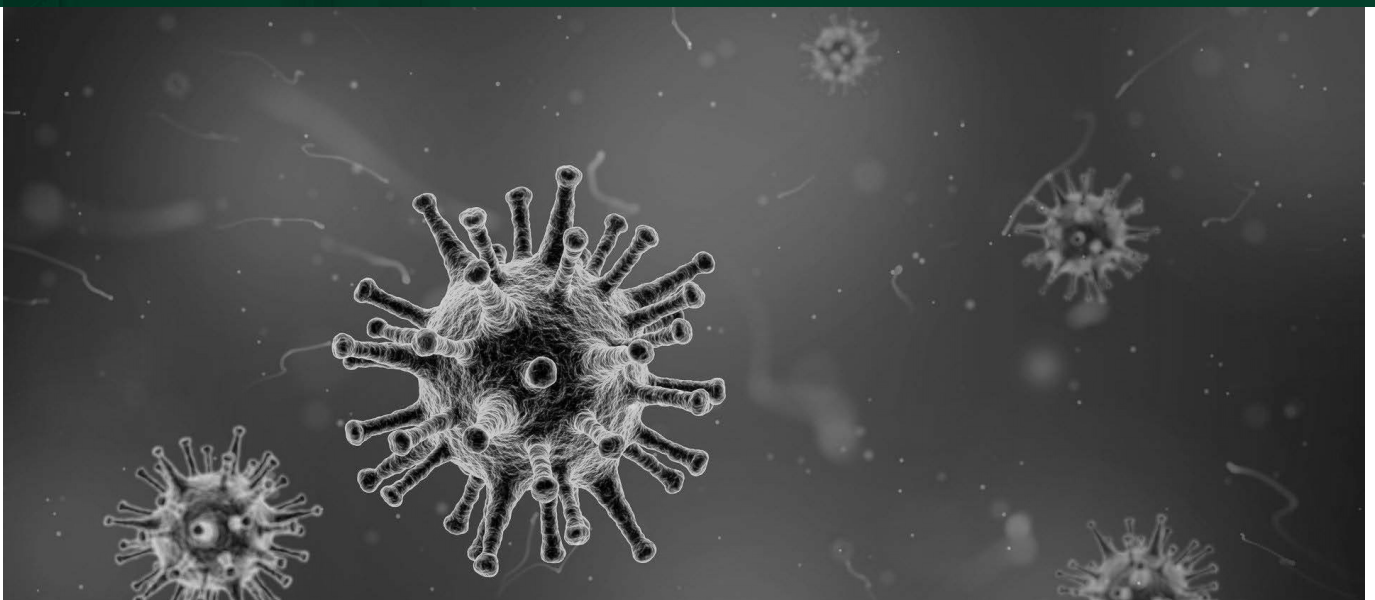


Independent workplace compliance



WHITE PAPER

COVID-19 contingency planning: General health and safety considerations for workplaces



COVID-19 contingency planning: General health and safety considerations for workplaces

Wednesday 1st April 2020

As our sector responds to the challenges of managing COVID-19 we recognise that your partially occupied or “empty” buildings may increase health and safety risk to staff and contractors still working. This may be security personnel, maintenance engineers or a handful of essential support staff. Health and safety management should be proportionate, but you do not want individuals to putting themselves at an unacceptable level of risk.

Some of the more frequent enquiries we are getting from customers and others are covering topics including:

What will the requirements be for health and safety during the pandemic period and with buildings being partially occupied or vacated?

Advice we have had through our Primary Authority Scheme recognises we are in an exceptional time and there will be challenges, but:

- The general thrust of ‘reasonably practicable’ for health and safety applies overall, this should not though be seen as an automatic reason to reduce safety checks (reactively or proactively) - the nature of risk or strict liability does not change unless it specifically involves COVID-19 as part of the hazard itself.
- However, statutory is statutory. If no exception/defence is written into the legislation, then COVID-19 does not become one.

So, review what critical activities/functions you have, how they are being affected and so what, if anything, you need to do differently. Re-assess the risk and implement the controls as required. Consider for non-critical activities/functions, how have these been affected by any changes and so what the consequences are. Again, as needed re-assess the risk and implement the controls as required. Document all changes.

Risk assessments

You still need to protect staff by making sure you have adequately assessed risk. Review risk assessments for continuing operations to make sure the relevant controls are still in place. COVID-19 is a new hazard to consider and you will need to make sure that you have the government recommended controls in place within your workplace.

First aid at work

It is likely that you no longer have a full complement of first aiders in your building. The Health and Safety (First-Aid) Regulations 1981 require you to make sure adequate and appropriate equipment, facilities and personnel, so employees can receive ‘immediate attention if they are injured or taken ill at work’.

The minimum first-aid provision on any workplace is:

- A suitably stocked first-aid kit;
- An appointed person to take charge of first-aid arrangements; and
- Information for employees about first-aid arrangements.

Review your first aid needs assessment to check you can still meet this requirement and communicate this information to staff. Where there is just one person working remotely consider how they will communicate.

The HSE have updated their website to advise employers to stop high risk activities if they cannot maintain suitable cover. They have also suggested sharing first aid cover with other businesses if they have the knowledge, experience and availability to support yours.

The HSE have also advised a 3 month extension to First Aid at Work and Emergency First Aid at Work certificates if you cannot access renewal training because of coronavirus. This is if the certificate expired after 16 March 2020. They expect anyone using this extension to be able to explain why they could not access training. During this time, if your First Aiders are still working you could ask them to do an online refresher until they can attend a course. Some providers have made these free to access on their websites.

Lone working

With the increased likelihood that there will be lone working taking place in your building, such as site security or essential maintenance, now is the time to also revisit your lone working procedures.

Check your lone working policy and risk assessment and review all risk assessments and method statements from contractors who may be lone working on site to check that they still meet with your site safety requirements.

Consider implementing specific communication methods and put in place a regular check-in procedure. If two-way radios are available, linked to security, make sure that all units are fully charged and issue a unit to any contractor lone or remote working on site. If not, instruct contractors to use a mobile phone where possible to keep in contact with security or your building manager etc.

For employees who need to be in your property, make sure that they have an 'off site' contact (such as their line manager) that they can check in with at regular intervals. Make sure that they check in with a designated person on arrival, and on leaving, together with pre-arranged intervals throughout the day.

Some further considerations:

- Identify tasks that can still be carried out and more importantly those that may no longer be safely possible.
- If your permit to work system requires someone to accompany contractors and others, what alternatives, if any, can you employ?
 - Can supervisors or line managers give authorisation?
 - Is the person already familiar with the site?
- How will you liaise with others where the building has shared occupancy?
- If revised, what will be your checking in/out procedures and how will they be implemented?
- Are there any further training requirements (e.g. emergency procedures, checking in and out, site safety etc.)?

Staff welfare

The Workplace (Health, Safety and Welfare) Regulations 1992 cover a wide range of basic health, safety and welfare issues and apply to most workplaces. If you still have staff in your buildings, you need to make sure that they still have adequate access to suitable washroom facilities and drinking water. Other considerations will be heating, adequate lighting and making sure that you maintain housekeeping, cleaning and disposal of waste as required.

The Government has issued advice in order to reduce the spread of COVID-19 in the workplace which includes cleaning and handwashing. You still need to be able to follow this advice where you have staff working. Public Health England have produced resources to support these objectives including a poster that can be accessed through:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873785/COVID19_Guidance_Employers_and_businesses_.pdf

Cleaning has also taken on an added significance in helping control the spread of COVID-19. The Government have provided advice for cleaning in non-healthcare settings. This can be found at:

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

Display Screen Equipment (DSE)

With numbers of employees enabled to work remotely during this period of social distancing, we have produced separate advice for managing DSE. This can be accessed here:

<https://www.assurityconsulting.co.uk/knowledge/insights/working-remotely-workstation-guidance>

Maintenance and statutory testing

A combination of maintenance, external statutory inspection, formal internal inspection and pre-user checks will be standard controls for work equipment within your building.

Where the operation of your building and facilities is not considered critical, it is unlikely that you will be able to have your equipment maintained or inspected within industry guidelines. If this is the case, equipment such as lifts and lifting equipment should be safely decommissioned.

Many organisations are continuing with their statutory examinations and tests as per legislation and the scheme they have in place. You should therefore determine what examinations or testing scheduled in the short term (next three months) are 'absolute' requirements and make sure suitable arrangements are in place to support this.

Training and Competence

Staff who are temporarily covering additional tasks and roles, must have received relevant training to undertake the role safely. They may not be in a situation where they will be receiving the level of supervision that a trainee would have ordinarily, so please make sure that they have support. Whilst we are all pushed, it is important for staff to know that they need to ask if they are unsure and not to “do their best” in this difficult situation.

Whilst this is an emergency situation, you must not bypass the requirement to complete certificated training for your staff, for example operating with HV electrical systems. If you do not have trained staff to work in these areas, they will have to be closed off and staff made aware of this.

Assurity Consulting will continue to take guidance from authoritative sources including Public Health England, the Health and Safety Executive and the Government regarding COVID-19. As further information becomes available so we will update this guidance as required. Sources of information include:

1. COVID-19: General advice (GOV.UK)

<https://www.gov.uk/guidance/wuhan-novel-coronavirus-information-for-the-public>

2. COVID-19: Advice for employers and businesses (GOV.UK)

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-covid-19#what-to-do-if-a-member-of-staff-or-the-public-with-confirmed-covid-19-has-recently-been-in-your-workplace>

3. COVID-19: Guidance for educational settings (GOV.UK)

<https://www.gov.uk/government/publications/guidance-to-educational-settings-about-covid-19>

4. Coronavirus (COVID-19): latest information and advice (HSE)

<https://www.hse.gov.uk/news/coronavirus.htm>

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For information on the services Assurity Consulting provide, please get in touch.



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