

Return to Work Post COVID - 19 Safety Precautions

Introduction

Following recent changes in Government advice there is obviously a more general return to work for more sectors than in the recent past, with differing start times occurring in different areas. Universities and Colleges have largely closed down in terms of student presence and face-to-face teaching, but essential services have remained with some staff on Campus throughout the pandemic period. Mike Stones UMAL's Technical Risk Manager, highlights some of the challenges of returning to work.

More activities are now being allowed, such as construction and laboratory work, and this will mean more staff on Campus over the coming weeks, but this is subject to there being a safe Campus and any off-campus activity is also a safe activity. Managing COVID-19, and limiting its health, safety, welfare and economic effects, is now top of any Risk Register. Detailed Sector guidance can now be found at <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19>. The ones covering Labs and Research Facilities, Offices, Vehicles and construction and Outdoor Work are particularly relevant to UMAL Members at present.

In a similar way to asbestos exposures, Campus users would be fearful of taking the virus home on clothing, artifacts or internally, and then spreading it to family members – this increases the risk, and the demands for confidence to safely use the Campus.



Talking to Staff

The “Talking with your workers about preventing coronavirus – a short guide” is an excellent HSE short note concerning a most important aspect of returning to work – that people have the confidence to return. This can only be done by two-way communications concerning their health and this document outlines some important aspects of this communication:

- Social distancing
- Organising your workplace
- Cleaning and sanitising
- Information and guidance
- Wellbeing and support

The issuing of Covid-19 risk management guidance documents demonstrates that the risks are being assessed, and with the co-operation of all, they can be managed. This increases the confidence of staff to attend Campus in the future.



Coronavirus Risk Assessment

The UK Government expects there to be a Coronavirus risk assessment to be completed and this to be posted on your website. This has the effect of:

- Ensuring, as far as reasonably practicable, that the duty of care to provide a safe place of work is satisfied
- Helping to encourage people that a return to work is a safe option
- Encouraging communication and transparency that the Institution is managing their health, wellbeing and safety duties

The essential Control Measures element of this should include:

- Hand washing
- Cleaning
- Social distancing – also limit movements between and within buildings – video meetings, e-mail, telephone conversations rather than meetings
- PPE and RPE
- Action to take if symptoms become evident
- Drivers, Visitors and Contractor controls – review Induction processes and Safe Systems of Work
- Promotion of mental health
- Medical certificates of fitness to work if a previous Covid 19 sufferer
- Protocols for excluding suspected and confirmed persons cases – and system for establishing contacts

The Health and Safety Executive Northern Ireland have a template for such an assessment, with more details on each of the above Control Measures. Other free Coronavirus risk assessment templates are available but MUST be adapted to suit local risks.

For local areas such as workshops or laboratories, rather than a Campus-wide assessment, changes in the way work is done will appear in local Risk Assessments and Safe Systems of Work, that must be updated as circumstances change.

There is a large display poster available, to be used following completion of this and other required risk assessments and implementation of required Control Measures, that states “Staying COVID-19 Secure in 2020 – We confirm we have complied with the Government’s guidance on managing the risk of COVID -19”. This poster is signed and dated and acts as an encouragement for staff, students, contractors and visitors to know the Campus is being managed for the Covid-19 risk.

Publicise the Control Measures to add confidence. Be seen to be checking risk assessments as this also gives confidence that the control measures are actually in place.



Changing Work Landscape

Social Distancing

There is a cultural aversion to this Control Measure but if it is compared to why seat-belts were voluntary, then compulsory and now, where no-one thinks about them as being a restriction of choice, the necessity for maintaining it can easily be communicated. The two metre distance can be achieved in ways other than people staying apart –

- physical barriers can be used such as taping off areas between desks
- closing down some toilet cubicles but beware of the rules in the Workplace (Health, Safety and Welfare) Regulations 1992 (as amended).
- Limit the number of users in contact point areas such as tea points with signage to this effect
- One-way systems in corridors and stairways – or can use marked areas on landings to people can pass safely, or only use side handrails, not central ones on wide stairways.

Contact Points

There are a number of contact points that need to be managed to ensure there is safe social distancing and robust regular cleaning regimes, these to include surfaces, tools and equipment. These include:



- Receptions – screens should be used
- Open plan offices (social distancing)
- Common rooms (social distancing)
- Staff rooms (social distancing)
- Workshops and laboratories (limit numbers and sharing of equipment and tools)
- Tea Points (use own cups, spoons, disposable items etc, stagger break-times)
- Photocopy rooms (social distancing and cleaning of equipment, especially touch points)
- Laboratories (work back-to-back rather than adjacent or facing and limit sharing of equipment/materials)
- Corridors and staircases – use of one-way systems is now commonly used
- Lifts (due to lift sizes, probably a single user room for the foreseeable future)
- Parking (signposted routes from parking areas around the Campus)
- Welfare facilities (regular cleaning required)
- Evacuations - Ensure separation at Assembly Points and encourage use of all exits to improve social distancing during evacuation

To limit contact, teams should be created so that they are present at different times, use different parts of the rooms and use different stairways/routes. Only essential workers that cannot work from home should be on Campus.

Touch Points

There are many such points that need to be managed/reduced:

- Door entry systems e. g digilocks (use contactless access controls)
- Door handles (propping open doors is not an option and hold-back devices should be used)
- Lift buttons (use gloves and clean buttons regularly)
- Signing-in pens (only use your own)
- Shared desk surfaces and seats (hot desking not promoted)
- ‘Clean desk’ policy for ease of surface cleaning
- Photocopiers or Printers
- Increased cleaning of mouse mats and DSE equipment, including touch screen monitors
- Workshop/laboratory shared tools and equipment (frequent cleaning and PPE)

- Vending machines (touch points need cleaning regularly)
- Waste bins (use automatic or open lid ones and have clear safe waste removal policy)
- Deliveries (use PPE)

All Touch Points should be assessed and eliminated if possible.

PPE and RPE

PPE remains the last resort control measure. It should only be used when other measures such as elimination, substitution and engineering controls, such as social distancing have been considered. Remember face masks primarily protect the user, the extent of which depends on the type of mask and how often it is changed.

Use of PPE can lead to cognitive drift with people thinking it is safe to reduce social distancing and can encourage bad habits.

Since 2002/2003, depending on the application of the legislation in different countries, the Health and Safety (Miscellaneous Amendments) Regulations law on PPE has stated that:

“Where it is necessary to ensure that personal protective equipment is hygienic and otherwise free of risk to health, every employer and every self-employed person shall ensure that personal protective equipment provided under this regulation is provided to a person for use only by him.”

As PPE will be the new norm for the foreseeable future this law has far-reaching consequences. In the past this meant a restriction on sharing of certain types of PPE, principally that touching the skin but now all protective equipment could be regarded as being in this category as the virus has the ability to remain on fabric and other surfaces of PPE where previously such a risk may be considered very low.

New norms of sharing and cleaning regimes will need to be implemented for all PPE where the above law is deemed to apply and individual/organisation risk assessments will need to be updated.



RPE includes respirators and breathing apparatus. RPE is not currently recommended unless it is used in clinical and care environments. This is partly because face-fit testing of RPE will present difficulties due to the number of touching points and social distancing restrictions. There is good HSE guidance on this subject, with the advice that no person showing Covid-19 symptoms should attend a face-fit session, even in permitted locations.

There is Government guidance on how, when and where to wear PPE for the general public, and that would include persons traveling to and from work and this can be supplemented by local guidance for PPE use on Campus.

The Scottish Government has stressed that the wearing of facial coverings must not be used as an alternative to other precautions such as social distancing and hand washing. PPE should be used in addition to these precautions.

Wearing a face covering is optional and is not required by the law, except for certain activities involving hazardous materials, these laws preceding Coronavirus. When wearing a face mask, it is important it is used properly, and before putting them on and after taking them off, you must wash your hands.

- Biohazard
 - Use special waste procedures if PPE is used by suspected/confirmed person
 - Some people are using hazardous waste procedures for all disposed PPE
 - Some office workers are using separate, but not hazardous, waste containers for PPE used in office

Pregnant Workers and Clinically Vulnerable People

- Treat pregnant workers as vulnerable persons
- Individual risk assessments and control measures needed as well as for any other clinically vulnerable person
- Isolate if a suspected/confirmed case is reported in the vicinity of the work area of the pregnant person

Homeworking

In the past there have been instances of homeworking with some Institutions having no official Homeworking. Risk assessments have existed but these generally implied that the homeworking was quite transitory. The present situation has created a longer term Homeworking environment and for some this could become a permanent situation.

Homeworking risk assessments and guidance documents should be reviewed to ensure that the longer term nature of this activity is addressed.

The mental health aspect of this should be included with frequent communications, continuing professional development and good change management procedures being of paramount importance.

- Encourage use of EAP systems already in place for persons under stress
- Strategy for sudden outbreak triggering a stress response
- Regular Web conferences – especially check-in with those ‘in quarantine’
- Encourage patterns of work, including dressing for work, even though at home
- Encourage healthy eating and home exercises
- Encourage use of e-learning programmes for Professional Development.

Emergency Staff

As numbers of people increase on Campus checks must be made to ensure there are sufficient:

- Fire Wardens
- First Aiders

The location of these workers should be where people are occupying Campus premises.

If there is a reduction/delay in Fire Drills this should be included in an updated Fire risk assessment giving the reason for the change. Encourage use of toolbox talks, particularly for new starters in lieu of actual drills.



Travel

- Social distancing, whether in public or private vehicles – travel does not carry a duty of care for the University or College, but it can be seen as a moral duty to provide guidance and therefore encourage confidence that controls are in place
- If travelling for work in a vehicle, keep the same work team together and keep social distancing
- Avoiding touching points.
- At the time of writing the wearing of face masks is still a topic of debate, but gloves should be worn

Maintenance

Before any areas are re-opened, checks should be made on:

- air conditioning and ventilation systems – the HSE state there is no evidence that use of air conditioning is increasing the risk but turning it on long before work hours and turning off long after work hours helps the air changes.
- valves to ensure they remain operational
- utilities including pipes, tanks and emergency generators
- equipment, especially safety measures, such as emergency brakes and guarding
- fire-fighting protection and warning systems, including emergency lights
- First Aid equipment
- compartmentation
- sanitise roofs and other plant areas close to air handling plant
- increased sanitising and ventilation in toilets
- Keep fire escape pressure systems turned on

Cleaning

As numbers of people increase on Campus checks must be made to ensure there are sufficient:

- Make cleaning obvious and visible to encourage confidence
- Increase cleaning regimes in all areas
- Provide wipe-down materials especially in high contact point areas, for example to allow people to wipe-down kettles or microwaves between use.
- Provide sanitizing units in all areas

Posters and Signage

There is now a ‘Charter for Safe Working Practice’ poster available, currently being displayed at construction sites. This outlines the local rules for protecting the workforce, visitors and the local community. As more Sectors are opened this type of poster may become applicable at Campus sites to encourage persons to have confidence their health and safety is being managed.

There is a range of information posters from UK Government, devolved Governments and NHS and other public bodies.

There is also a range of new social distancing, hand washing, wear mask and follow route signage commercially available. In addition, there are posters showing the general principles for handwashing and respiratory hygiene.

Route signage, whether from car parks or in corridors and stairs should be encouraged to assist social distancing.

Law Enforcement

- General Safety
Generally, enforcement authorities look at risk levels present compared to the reasonable levels that should be present when they consider taking action. Their official statements say they will take a pragmatic and proportionate approach to breaches of primarily the Health and Safety at Work Act and Management of Health and Safety at Work Regulations 1999.
- RIDDOR
The official instruction is:
“You must only make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when:
 - an unintended incident at work has led to someone’s possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence.

- a worker has been diagnosed as having COVID 19 and there is reasonable evidence that it was caused by exposure at work. This must be reported as a case of disease.
- a worker dies as a result of occupational exposure to coronavirus.”

NOTE: Under the Health and Safety (Miscellaneous Amendments and Revocation) Regulations 2017 a definition of “working day” now prevails when calculating the seven consecutive days (excluding the day of the accident) for RIDDOR to apply: ““working day” means any day other than a Saturday, a Sunday, Christmas Day, Good Friday or a day which is a bank holiday under the Banking and Financial Dealings Act 1971 in any part of Great Britain;”.

- Government Guidance
This is not law per se. However following HSE and Government guidance in each UK country helps to demonstrate safety law compliance. There cannot be an action for breach of guidance per se, but if guidance is not followed the reason for this should be documented as this would be the defence document should an action occur due to the level of risk being thought to be higher than could be the case when an incident is investigated by the enforcing authorities.

Complacency

- Campus users must be confident that the Campus is safe, even if there is a recurrence of the virus creating a local ‘hot spot’ or a national issue. Safety, health and welfare information must be kept “fresh”, updated and regularly communicated.
- Threat analysis and trend-line analysis, updated as new information is obtained, should become the new norm for risk management, with this information publicised to prevent complacency.
- It is already known that there is a phenomenon of “social distancing fatigue” that is occurring later in the day as people get comfortable with their work surroundings – this must be avoided
- Have plans in place for coronaphobic persons who do not want to return to work through welfare discussions. There is NHS guidance on the types of questions to ask. However, sensitivity is required as this could involve sensitive data, and under GDPR a data protection impact assessment may also be required.

If you have any queries or require further advice, please contact **Mike Stones**, Technical Risk Manager, mike.stones@umal.co.uk