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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 returning to workplaces

Thursday 25th June 2020

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As our sector continues to respond to the challenges of managing COVID-19 some workplaces will remain partially occupied or empty, whilst some start to become re-occupied.

The introduction of "COVID-19 Secure" as further control measures now needed for our workplaces adds additional challenges on top of the routine requirements we need in place to keep our buildings and their occupants safe.

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

### **What will the requirements be for health and safety as we look to remobilise?**

Advice we have had through our Primary Authority Scheme recognises we remain in exceptional times. When balancing the needs of the organisation, remobilising staff and re-opening our buildings it is important for us and our senior management to remember:

- The general thrust of 'reasonably practicable' for health and safety applies overall and 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.

How your business operations may have changed as a result of the "new normal" should be reviewed to see how they are being affected and so what, if anything, in your practices and procedures you need to amend to reflect this. Re-assess risk and implement the controls as required.

Finally consider the requirements of COVID-19 Secure as part of your new controls and recognise these in your risk assessments and procedures too.

### **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 Risk assessment (COVID-19 Secure)

The requirements for COVID-Secure means assessing and controlling the risk of transmission of the virus in your workplace by way of a risk assessment. The Government have produced guidance for different workplaces and these should be followed as best practice for control within your industry sector. The guidance documents focus on key controls and advice to maintaining social distancing and hygiene as we remobilise.

In supporting this strategy and under the heading "Working safely during Coronavirus (COVID-19)" the Government produced 8 sector based guidance documents, all published on the 11th May and covering:

1. Construction and other outdoor work
2. Factories, plants and warehouses
3. Labs and research facilities
4. Offices and contact centres
5. Other people's homes - people working in, visiting or delivering to other people's homes.
6. Restaurants offering takeaway or delivery
7. Shops and branches – effectively retail premises
8. Vehicles - People who work in or from vehicles, including couriers, mobile workers, lorry drivers, etc.
- 9.

For the education sector specific information for "implementing protective measures in education and childcare settings" has been separately produced via the Department of Education.

Links to the requirements for both set of documents are at the end of this guidance as is the HSE "Working safely during the coronavirus (COVID-19) outbreak" publication which also included information on COVID-19 Secure risk assessment.

In documenting your risk assessment, you should consider what work you can do safely and what measures are needed to reduce risk. If you have more than 50 employees there is an expectation to publish your risk assessment on your website.

### First aid at work

It is possible that you do not have your usual 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'.

Review your first aid needs assessment as staff return to check you can still provide suitable first aid and communicate this information to staff.

Additionally, review any additional protective measures that your first aiders may need to deliver first aid safely.

The HSE guidance for "First aid during the coronavirus (COVID-19) outbreak" can be found at: <https://www.hse.gov.uk/coronavirus/first-aid-and-medicals/first-aid-certificate-coronavirus.htm>

## The Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR)

You must only make a report under RIDDOR of a COVID-19 case if the exposure was due to someone's work.

- An unintended incident led to exposure (a dangerous occurrence) - for example if a lab worker accidentally smashed a vial containing the virus.
- A worker has been diagnosed and there is reasonable evidence it was caused by exposure at work (case of disease)
- A worker dies as a result of occupational exposure to coronavirus. This must be reported as a work-related death caused by a biological agent.

As COVID-19 is prevalent in the general population, there has to be reasonable evidence that a work-related exposure is the cause of the disease.

Further information on determining this can be found on the HSE website:

<https://www.hse.gov.uk/coronavirus/riddor/riddor-reporting-further-guidance.htm#disease-law>

### Lone working

With staff still advised to work from home where they can, workplaces will continue to have fewer individuals in the coming months increasing the likelihood of lone working.

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.)?

Many staff will have been working from home for some time now which can affect stress and mental health. Some will still be on furlough leave and feel detached from the workplace. The key to supporting all staff is maintaining good communication. We have published advice in recent months:

<https://www.assurityconsulting.co.uk/knowledge/insights/homeworking>

The HSE have also produced guidance on "Lone working without supervision", the link is below

<https://www.hse.gov.uk/toolbox/workers/home.htm#Lone>

## **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. Where staff are returning, you need to make sure that they have adequate access to suitable washroom facilities and drinking water. Other considerations will be making sure that services that may have been postponed are re-instated including replenishing consumables and arranging waste collection.

With the recommendation to increase ventilation by opening windows, you may consider relaxing dress codes to ensure staff remain comfortable and that sleeves do not hamper increased hand washing.

Cleaning continues to be significant in helping control the spread of COVID-19. The Government have provided advice for cleaning in non-healthcare settings at:

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

The HSE have also produced information on "Cleaning, hygiene and hand sanitiser" at:

<https://www.hse.gov.uk/coronavirus/working-safely/cleaning.htm>

## **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>

It is important that businesses communicate and staff have opportunity to raise any issues with their home DSE set up so that you can provide them with any additional equipment they may need or advice.

Even with workplace remobilisation, home working is still prevalent in many organisations and the HSE have updated their advice to "Protect home workers, which includes advice on DSE:

<https://www.hse.gov.uk/toolbox/workers/home.htm>

## 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 was not considered critical, it is possible that you will be unable to have your equipment maintained or inspected within industry guidelines and lockdown has created a backlog of inspections. Equipment should only be used outside of its test regime if you can demonstrate that it is critical for essential work and that it can still be operated safely. Therefore, it is important that tests and inspections are re-established.

Your legal obligation remains to ensure that equipment is safe to use. The HSE have produced various guidance including that covering:

Gas safety during the coronavirus outbreak - <https://www.hse.gov.uk/coronavirus/gas-safety/index.htm>

Thorough examination and testing of equipment during the coronavirus outbreak - <https://www.hse.gov.uk/coronavirus/equipment-and-machinery/work-equipment.htm>

Thorough examination and testing of equipment during the coronavirus outbreak: Your legal obligations - <https://www.hse.gov.uk/news/assets/docs/loler-pssr-during-outbreak.pdf>

## Training and Competence

All staff returning to the workplace will require training via an induction to familiarise them with new control measures for distancing and COVID-19 and the findings of your risk assessment.

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 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/coronavirus>

## 2. Working safely during Coronavirus (COVID-19) (GOV.UK)

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19>

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

<https://www.gov.uk/coronavirus/education-and-childcare>

## 4. Working safely during the coronavirus (COVID-19) outbreak (HSE)

<https://www.hse.gov.uk/coronavirus/working-safely/index.htm>

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

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

## 6. Staying safe outside your home (GOV.UK)

<https://www.gov.uk/government/publications/staying-safe-outside-your-home/staying-safe-outside-your-home>

This guide was produced on the 26th March 2020 (and last updated on 22nd June 2020)

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



Call us on  
+44 (0)1403 269375



Email us at  
[info@assurityconsulting.co.uk](mailto:info@assurityconsulting.co.uk)



Visit our website  
[assurityconsulting.co.uk](http://assurityconsulting.co.uk)

