

Reopening Work Premises after Covid-19

I want to reopen my site – where do I start?

Given that existing risk assessments may not cover Covid-19 hazards in sufficient detail, employers may wish to develop a specific 'Reoccupation Risk Assessment' as part of their reoccupation planning. They must also consider how the key findings and controls from the risk assessment are effectively communicated to staff and other interested parties.

In terms of topic areas, a reoccupation risk assessment might cover the following:

- how employees and contractors can safely enter premises that may have been closed for a number of weeks to prepare the site for reoccupation
- how to safely restart equipment and machinery that has been de-energised for a period of time
- how social distancing measures will be maintained (especially around entrances, lifts and other common areas)
- the provision of adequate hand washing and welfare facilities
- cleaning operations (in the context of Covid-19)
- whether further training is required (and how this will be delivered).



What issues do I need to think about in terms of building safety?

Fire safety systems

In terms of reoccupation, all relevant fire safety equipment and systems must be tested before employees and others are allowed back on site. This would typically include:

- a full functional test of the fire detection and alarm system (using multiple call points across the site and involving the call receiving centre if appropriate)
- a full discharge test of the emergency lighting system across the site
- a visual inspection of all fire extinguishers to ensure that they are correctly located, full and not obviously damaged
- checking that fire escape routes are clear of any obstructions
- checking that final fire escape doors are unlocked and operational
- checking the operation of internal fire doors to ensure that they close properly
- checking that automatic fire dampers, smoke venting and smoke extraction systems are operational.

Employers must also be aware of any formal maintenance inspections which may have been missed during lockdown and arrange for these to be completed before reoccupation.

Water management – control of Legionella bacteria

Where water systems have been completely taken out of use, or only partially used for an extended period of time (which could be as little as two or three weeks), there is an increased risk that Legionella bacteria could have multiplied to hazardous concentrations. As such, there are a number of factors that need to be considered when bringing the water system back into use.

Firstly, the system should be thoroughly cleaned, flushed and disinfected. To confirm the effectiveness of cleaning, flushing and disinfecting measures, microbiological sampling should then be undertaken, between two and seven days after the system is refilled. Duty holders should also conduct temperature checks on designated outlets, i.e. sentinel taps, etc (as outlined in the written scheme) to ensure that the system is performing as expected.

It is also important to remember that, prior to any cleaning, flushing or disinfection work, a site-specific risk assessment and method statement should be developed. In particular, control measures need to be established to protect those undertaking initial flushing, due to the risk of them being exposed to Legionella from contaminated aerosols.

Finally, it should be remembered that where a wet cooling tower or evaporative condenser has been taken out of use, there is a requirement under the Notification of Cooling Towers and Evaporative Condensers Regulations 1992 to notify the local authority that it is being returned to service.

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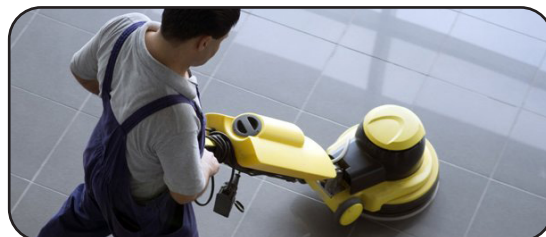
What issues do I need to think about in terms of building safety? (cont.)

Asbestos Containing Materials (ACMs)

Duty holders should complete a thorough visual inspection of all ACMs prior to reoccupation to confirm that there has been no damage during lockdown. Where any damage to ACMs is observed, the area should be isolated immediately and advice sought from a specialist asbestos management company.

Deep cleaning for reoccupation

Whether or not an employer decides to 'deep' clean their premises ahead of reoccupation will depend on various factors, including: whether buildings have been accessed during the lockdown period (and if recently occupied may therefore be contaminated with Covid-19); whether staff (i.e. security guards) have been on site; and the expectation from employees and other users in terms of whether the premises have been deep cleaned. In many cases cleaning for general hygiene and appearances purposes will be all that is necessary.



What about plant and equipment safety?

Restarting plant and equipment

Employers must establish a clear plan for restarting any equipment that has been taken out of service during lockdown. This is to ensure the safety of those who are undertaking the maintenance as well as protecting the equipment from damage. The restart process may require electrical and mechanical isolations to be reconnected, fluids to be refilled and plant and equipment to be reenergised in a specific sequence or order. Planning should therefore be based on manufacturers' instructions, commonly accepted technical guidance and by making reference to specialist contractors (where required). Employers must also ensure that those who are carrying out the work are competent to do so and the work is correctly coordinated between them to avoid risks.

Statutory inspections

Whilst the HSE 'recognises the potential challenges when carrying out legal requirements for thorough examination and testing (TE&T) of plant and equipment as a result of additional precautions people need to take to help reduce risk of transmission of coronavirus (Covid-19)' they have stated that 'the law for Lifting Operations and Lifting Equipment Regulations (LOLER) and Pressure Systems Safety Regulations (PSSR)' remain in place. As such, employers must ensure that statutory inspections on lifting equipment, pressure systems, fixed electrical systems, PAT, gas appliances, etc are 'in date' prior to the reoccupation of buildings. Employers must also consider whether equipment which has not been used for an extended period of time needs a statutory inspection even if one is not due. For example, where personal lifting equipment has been left in a condition which may have compromised its structural integrity or where a lift needs servicing to ensure it is going to be operated normally and safely.

Training and supervision

In returning plant and equipment into full use, employers must ensure that employees have retained adequate knowledge to use it safely. As such, it may be necessary to run refresher training for certain items and/or systems. This is particularly relevant to employees who only had limited experience prior to the lockdown. Employers must also review the status of any planned periodic refresher training which may have been missed during the lockdown, e.g. forklift truck training.

Employers must also ensure that there is adequate supervision of those using plant and equipment, particularly if sites operate for an extended period of time and/or experienced supervisors are not available.

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Do I need to make changes to the overall management of safety on site?

Self-isolation

In terms of self-isolation for those who believe that they have the disease, employers should provide employees and other interested parties with clear advice on staying away from the workplace if they have any symptoms. Visitors to site should continue to be minimised where possible. However, essential site visitors (i.e. maintenance contractors) should be asked to confirm that they consider themselves to be virus free.

Where an individual becomes unwell on site and is displaying Covid-19 symptoms, employers should have a clear plan in place to get them out of the building as efficiently as possible (using a route that exposes them to as few other people as possible), which details how potentially infected areas will be cleaned and how anyone who may have been exposed to the infected person will be notified (and requested to begin self-isolating at home for fourteen days).

Social distancing

Employers must carefully plan how social distancing is going to be maintained. In particular, reviewing the workplace layout and how people circulate within it is key. Key questions to consider include:

- how can employees and others safely enter buildings
- are there 'pinch points' within buildings and how are these managed
- how to protect reception/security staff, i.e. are screens required
- how will visitors be managed, i.e. are they required to sign a touch screen
- how will people keep a safe distance in toilet/washing/showering facilities (remembering that delivery drivers and others working on site will also require access)
- how do people access drinking facilities
- where will people eat
- how will people exercise/get some fresh air.



Possible control measures may include: the use of physical barriers; introducing one way systems; floor markings; and clear signage.

Another approach is to reduce the number of people on site at any one time by introducing a staggered/split working day, where possible.

Good hygiene practices

In reopening their premises employers must therefore consider how employees and other interested parties on site can follow good hygiene practices, and whether any further measures are required. For a small office, this may be as straightforward as ensuring that there is an adequate supply of soap in washrooms. However, for busy sites with multiple visitors, consideration should be given to the installation of additional hand cleaning stations. There may also be specific tasks that require further measures, for example those who handle external post and deliveries.

Employers must also review how cleaning on site is managed, both in terms of providing good hygiene standards (especially in commonly used areas) and how cleaning staff are protected.

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Do I need to make changes to the overall management of safety on site? (cont.)

Management of fire and first aid

In preparing for the reoccupation of their sites, employers must review their fire risk assessment and the fire management arrangements contained within it. Not only should this review consider any changes to fire safety systems and equipment (as outlined previously), but also issues such as adequate provision of fire wardens/marshals and the suitability of Personal Emergency Evacuation Plans (PEEPS) – especially if working hours are elongated and/or previous role holders are no longer available to continue.

In line with the fire risk assessment and management arrangements, employers must review their first aid 'assessment of need' to ensure that it is still sufficient. Based on this, they may then need to train more first aiders to ensure that there is adequate coverage. Employers must also review the levels of first aid equipment that they have on site and ensure that these are still adequate. In particular, consideration should be given to the purchase of additional resuscitation face shields, disposable gloves and aprons.

Training

In addition to any specific refresher training required to operate plant and equipment (as outlined previously), employers must also review whether any general refresher or updated induction training or briefing is required for those on site. This may be particularly relevant where social distancing measures have been introduced, for example a change in First Aider/Fire Warden coverage.

Managing contractors

Employers already have a range of formalised and implied legal duties in respect of the health and safety management of contractors. In moving towards reoccupation of sites, employers must review their existing contractor controls to ensure that they adequately cover any new risks introduced by the Covid-19 pandemic. In particular, issues such as ensuring social distancing; provision of welfare facilities and lone working arrangements are robust and that any works are properly controlled including by the use of permits to work.

Managing wellbeing

Employers should consider how to support the mental wellbeing of their employees who are returning after a significant period of either home working or furlough. Where work-related issues present themselves, the HSE's published stress Management Standards should be followed. Employers may also want to review how they can support their employees on broader issues, such as bereavement support and general anxiety about the ongoing situation (for example by signing up for a formal Employee Assistance Programme providing confidential telephone advice and counselling).

Are there any other issues to consider?

There are subtle but important regional differences in the way that the lockdown measures are being applied in different parts of the UK. The most significant of these is in Scotland, where a wider range of sites have been shut, including non-essential construction, however this is not a legal requirement and only relates to guidance issued by the Scottish Government as opposed to requirements. As such, employers must be remember that these regional differences will also influence the timing of the reoccupation of their premises.

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