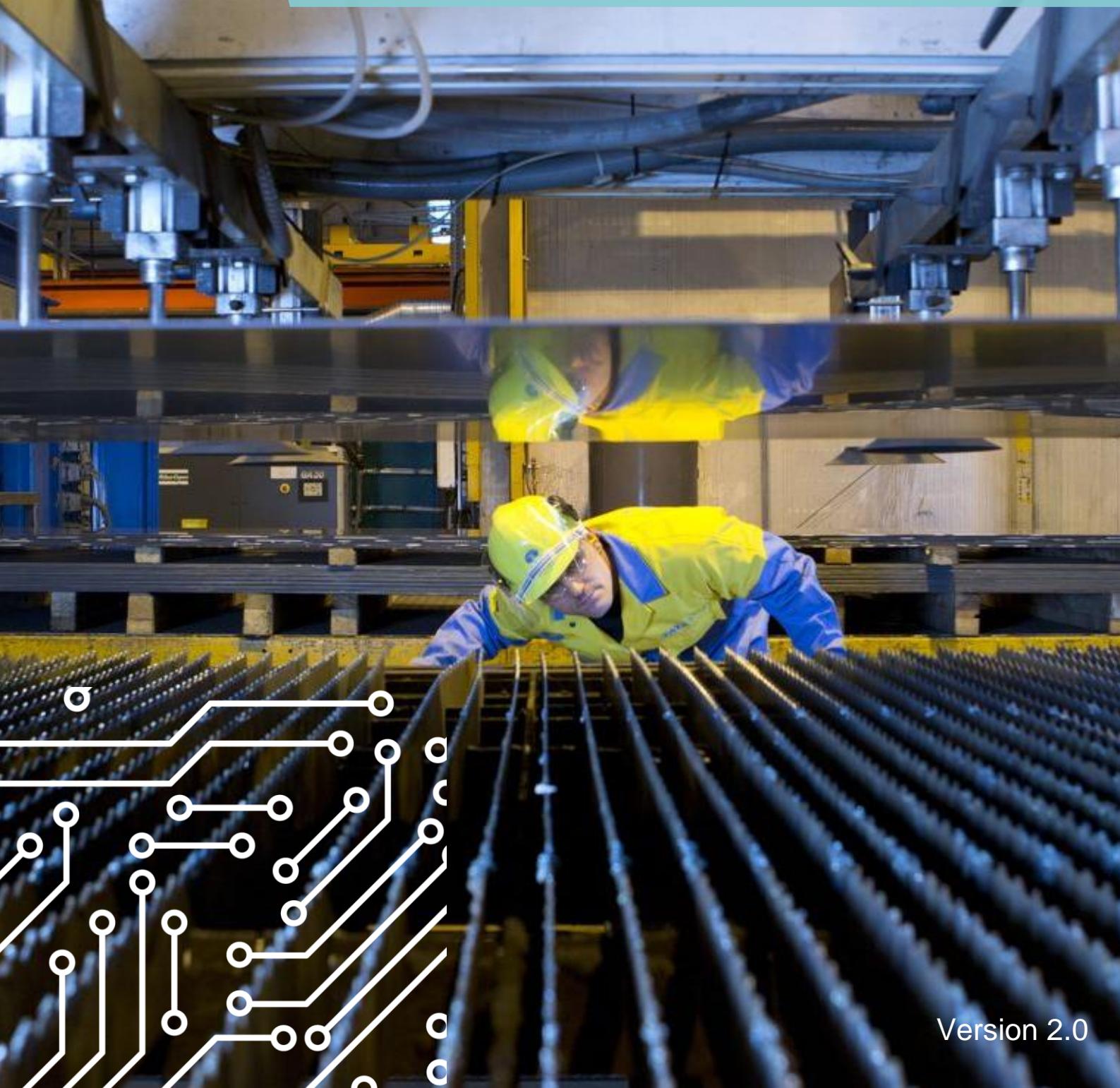


Protecting your employees during the COVID-19 pandemic



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Introduction

As the COVID-19 world pandemic impacts the UK, the steel industry will also need to adapt to the changing circumstances and implement new measures to protect employees from the risk of infection. The Code of Practise is based on official Government advice and Public Health England (PHE) [guidance](#). Although the guidance is issued for everyone in the UK, advice may differ in [Wales](#) and [Scotland](#).

The Code of Practice (CoP) is meant to provide guidelines to minimise risks to employees of steel companies in the UK. However, it is not prescriptive, in the sense that other similar measures may be implemented if they achieve the same effect. Similarly, if there are site characteristics that prevent implementing actions described below, other actions can be taken to compensate for this. It is a non-exhaustive list of measures to be considered to minimise risk.

Although this is written for steel companies to help keep their employees safe, it is also relevant to contractor companies in people safe on their sites. As such, the best practices listed in this CoP should be shared with contractors.

The [Health and Safety Executive](#) offer additional guidance on how to reduce risks at the workplace. The CoP does not supersede or replace any existing H&S legislation or obligations but has been written to support steel companies in managing this pandemic and in doing so protect the health of its employees. Steel companies are obligated under The Health and Safety at Work etc Act 1974 and other appropriate regulations to keep their employees safe, which continues to apply.

It is expected that some form of social distancing guidelines will be in place for the foreseeable future. As such, steel companies should consider their medium to long term plans for minimising the risk of infections onsite.

Companies must strengthen their communications with employees, communities, and customers, about the current status of the operations and actions undertaken to tackle Covid-19 to maintain trust and goodwill.

Government guidance

The Government has issued specific guidance which the steel sector should adhere to:

- [Working safely during coronavirus \(COVID-19\)](#)
- [Staying alert and safe \(social distancing\)](#)
- [Stay at home: guidance for households with possible coronavirus \(COVID-19\) infection](#)
- [Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19](#)

What is COVID-19

Coronaviruses are a large family of viruses which may cause illness in animals or humans. In humans, several coronaviruses are known to cause respiratory infections ranging from the common cold to more severe diseases such as Middle East Respiratory Syndrome (MERS) and Severe Acute Respiratory Syndrome (SARS). The most recently discovered coronavirus causes coronavirus disease COVID-19.

What are the symptoms of COVID-19

The NHS and WHO identify the following symptoms of COVID-19:

- A high temperature – this means you feel hot to touch on your chest or back
- A new, continuous cough – this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours
- A loss of, or change in, your normal sense of taste or smell (anosmia)
- Tiredness
- Some patients may have aches and pains, nasal congestion, sore throat or diarrhoea.

If someone has COVID-19 symptoms at work

If someone becomes unwell in the workplace with coronavirus symptoms, they should:

- Tell their employer immediately and go home
- Avoid touching anything
- Cough or sneeze into a tissue and put it in a bin, or if they do not have tissues, cough and sneeze into the crook of their elbow
- Use a separate bathroom from others, if possible.

If there is more than one case of COVID-19 associated with the site, the local PHE health protection team should be contacted to report the suspected outbreak.

If anyone has symptoms of coronavirus (COVID-19), however mild, OR have received a positive coronavirus (COVID-19) test result, the clear medical advice is to immediately self-isolate at home for at least 10 days from when the symptoms started. After 10 days, or longer, if the symptoms other than cough or loss of sense of smell/taste still persist, continue to self-isolate until feeling better.

If the unwell person lives alone, they must self-isolate for 10 days. If they live with others and is the first to have symptoms, they must self-isolate for 10 days. Everyone else in their household must self-isolate for 14 days.

If anyone else in the household starts displaying symptoms, the person with the new symptoms must self-isolate for 10 days. This is regardless of where they are in the 14-day isolation period.

You can get more advice or help:

- In England, by using the [NHS 111 coronavirus symptom checker](#) or calling 111
- In Scotland, by using the [NHS inform Scotland symptom checker](#)
- In Wales, by using the [NHS Direct Wales symptom checker](#)
- By calling 999, if someone is seriously ill or life is at risk.

It's best for the unwell person to use their own mobile phone or computer to access these services.

The Government has announced that testing is available for anyone who has symptoms of coronavirus (COVID-19). Some people in England without symptoms can have the test too, if they:

- Live with someone who has coronavirus symptoms
- Have been told to have a test before going into hospital, for example, for surgery
- Live in areas with a local coronavirus outbreak

Testing needs to be done within the first 5 days of symptoms developing.

Vulnerable employees

As per NHS guidelines, vulnerable employees include, but are not limited to, those who:

- Have a long-term health condition, for example asthma, diabetes or heart disease, or a weakened immune system as the result of medicines such as steroid tablets or chemotherapy
- Are pregnant
- Are aged 70 or over
- Care for someone with a health condition that might put them at a greater risk
- higher-risk groups as identified by Public Health England report [Disparities in the risk and outcomes of COVID-19:](#)
 - are older males
 - have a high body mass index (BMI)
 - have health conditions such as diabetes
 - are from some black, Asian or minority ethnicity (BAME) backgrounds

Procedures should be in place to correctly identify vulnerable employees, and assess possible measures to take. Also consider which measures to take for employees who have (or are living with someone) told to shield by the NHS. From 1st August in England, Scotland, Northern Ireland, and 16th August in Wales, shielding is paused for everyone on the shielding list and they can go to the workplace as long as it is COVID-secure, but should carry on working from home wherever possible.

Furthermore, consider:

- Assign tasks that can be done in self-isolation for vulnerable employees
- What actions can be taken for employees that have been told to shield by the NHS
- Take extra care of vulnerable employees such as reception staff with their frequent interaction with visitors
- Carry out a new risk assessment for all pregnant women, to identify the risks and consider what measures can be put in place to protect them
- Assessing whether BAME employees are more likely to be put in positions of greater risks, e.g. frontline work, as highlighted by Public Health England.

Management of change

Considerations:

- A management of change risk assessment process should be used where there is a significant change which may affect the safety of people, assets and environment, e.g. reduction in manning, ability to manage competence training, changes to chemical and hazardous substances inventories
- Implement a decision log over organisational change and new practices to provide an overview and manage creeping change.
- Ensure continued engagement with employees and representatives to examine and understand the unexpected impacts of the changes to the workplace.

Hygiene

Considerations:

- Increase availability of hand sanitiser onsite at key points
- Allow regular breaks to wash hands
- Provide additional handwashing facilities (e.g. pop-ups) to the usual welfare facilities, particularly on a large spread out site or where there are significant numbers of personnel on-site, including plant operators
- Ensure adequate supplies of soap and freshwater are readily available and kept topped up at all times
- Provide hand sanitiser (minimum 60% alcohol-based) where handwashing facilities are unavailable
- Regularly clean the handwashing facilities
- Provide suitable and sufficient rubbish bins for hand towels with regular removal and disposal.
- Frequently cleaning of handwashing and hygiene facilities

Toilet and Shower Facilities

Considerations:

- Ensure provision of paper towels in the washrooms, if possible
- Advise that employees should wash or sanitise hands before and after using the facilities
- Use signage to clarify the maximum number of people that can use toilet facilities at any one time
- Use signage, such as floor markings, to maintain 2m distance between people when queuing or 1m with risk mitigations where 2m is not viable
- Enhance the cleaning regimes for toilet facilities, particularly door handles, locks and the toilet flush.

Enhanced site cleaning

Considerations:

- Increased and regular disinfection and cleaning of welfare and communal facilities
- Introduce cleaning routines for shared workstations and equipment
- Assess which parts of the machines the employees touch and introduce a rota for cleaning these areas, especially between shift changeovers
- Be mindful of work stations with frequent employee changes (e.g. control rooms) and the extra cleaning that will be required
- Work with employees to ensure their help in the increased cleaning
- If any employees have tested positive for COVID-19, please follow [the decontamination procedures](#)
- If there is more than one case of COVID-19 associated with your workplace, you should contact your local PHE health protection team to report the suspected outbreak.

Employee engagement

Considerations:

- Ensure to consult employees and union representatives on health and safety and involve them in the decision-making process
- Make sure engagement includes the health and safety representative and unions, potentially through a committee for COVID-19
- Good employee engagement will ensure trust and collaboration between employer and employees
- Covid-19 risk assessment should be done in collaboration with employees and union representatives
- As is standard procedure in the steel industry, employees (in partnership with the employer) are involved in risk assessment of the workplace and the general creation and review of health and safety policies, alongside union representatives.

Information and communication

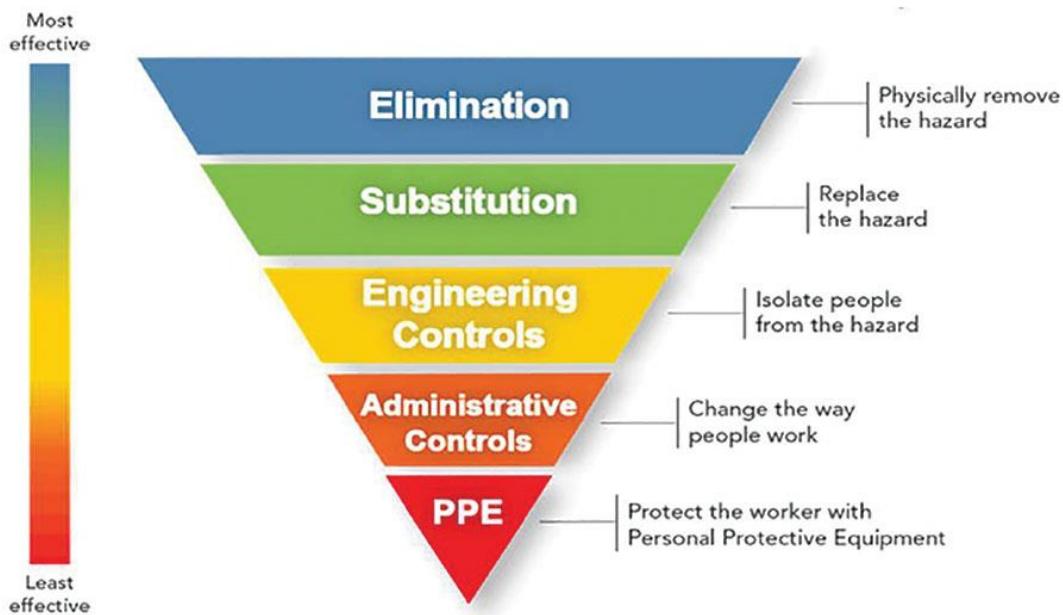
Considerations:

- Inform employees of COVID-19 symptoms, what to do if becoming ill at home or work, or have members of the family become ill with the symptoms of COVID-19
- Inform of procedures for self-monitoring of health condition and reporting concerns
- Issue 'how to' clean hands posters to raise awareness and inform employees on good hygiene practices. Translated into several languages for non-English speaking lorry drivers
- Make employees aware of risks associated with high-use touchpoints such as stair rails, door handles, pens etc.
- Ensure a physiologically safe environment for employees by being conscious of the mental health of the employees and checking-in with teams regularly.
- Gather and monitor:
 - Diagnosis of COVID-19 amongst employees
 - Employees in self-isolation
 - Employees at home able/unable to work.

Social distancing at work

As per Government guidance, where the social distancing guidelines cannot be followed in full in relation to a particular activity, businesses should consider whether that activity needs to continue for the business to operate, and, if so, take all the mitigating actions possible to reduce the risk of transmission between their staff. If companies decide the work should continue, employees should work side by side or facing away from each other rather than face-to-face if possible.

The hierarchy of control in Health and Safety should be used to minimise any risk, where reasonably practicable.



Minimise

Considerations:

- Avoid touching eyes, nose, or mouth with unwashed hands
- Avoid handshaking
- Avoid the use of non-personal (colleagues') devices (phones, headsets, keyboards, etc.) and PPE
- Stairs would be used in preference to lifts or hoists and consider one ways systems
- Employees should avoid bringing items to work from home (excluding food and water)
- Promote the electronic exchange of documents rather than hard copies.

Reduce

Considerations:

- Reduce the number of people in attendance at site inductions and consider holding them outdoors wherever possible
- Maximise online meetings and telephone conferences
- Use back-to-back or side-to-side working rather than face-to-face whenever possible
- Ensure all physical/face-to-face meetings take place with 2m distance, or 1m with risk mitigations where 2m is not viable
- Minimise the number of employees involved in tasks that cannot be done 2m apart
- Stagger shift change handovers where possible
- Stagger showers and clocking times where possible
- Use signage such as floor markings, to maintain 2m distance between people when queuing, or 1m with risk mitigations where 2m is not viable
- Increase ventilation in enclosed spaces, if using centralised ventilation systems that remove and circulates air to different rooms turn off recirculation and use a fresh air supply
- Risk assessments should be conducted to evaluate control measures available onsite
- Consider the addition of screens between personnel.

Isolate

Considerations:

- Arrange staff on shifts to ensure a regular mix of the same people and to try to prevent people swapping shifts to make certain the virus does not spread across multiple teams. Keep a record of shift patterns for 21 days, in case the NHS Test and Trace service needs assistance with requests for data
- Issue instructions to maintain a 2m distance (or 1m with risk mitigations where 2m is not viable) and actively police this. When this is not possible, consider other measures of control to minimise the risk of infections
- Develop a plan of action for co-workers in the event that an employee becomes infected or displays symptoms, e.g. self-isolation for team members in close contact, increased monitoring etc.
- Consider solid barriers as a measure of control.

PPE

Considerations:

- If the 2m social distancing guidelines cannot be maintained, risk assess the activity using the hierarchy of controls and against any sector-specific guidance. Be mindful that PPE (Personal Protective Equipment), including the use of RPE (Respiratory Protective Equipment) i.e. masks, is the last resort in the control hierarchy. Face coverings are not a replacement for other ways of managing risk
- PPE must not increase the risk of touching the eyes and face with hands, and not give the wearer a false sense of security which reduces the taking of other distancing measures.
- As per Government guidance, workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings or when responding to a suspected or confirmed case of COVID-19
- Re-usable protective equipment (for example a face visor) should be thoroughly cleaned after use
- Single-use PPE should be disposed of so that it cannot be reused
- RPE should still be used to protect against an existing workplace health hazard i.e. when working with hazardous substances such as gases, solvents, powdered chemicals, mists and sprays or entering a confined space
- Be aware of the difference between RPE, PPE, hygiene masks, and face coverings i.e. scarfs. These do not follow the same requirements in terms of use and fitting and are not interchangeable for existing workplace hazards
- Hygiene masks and face coverings are not considered as PPE and would not be deemed suitable to protect against an existing workplace hazard e.g. lead or dust
- Wearing a face covering is required by law when travelling as a passenger on public transport in England
- Supporting employees in using face coverings safely if they choose to wear one
- If face masks are used, ensure the masks fit according to [HSE guidance](#)
- Ensure employees are consulted at an early stage on the suitability and effectiveness of PPE.

Common areas

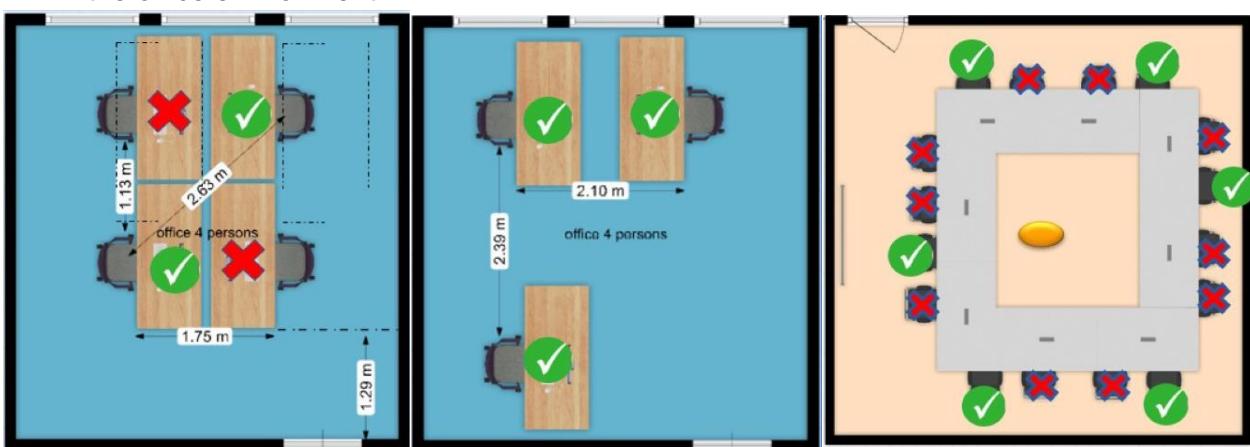
Considerations:

- Assess the possibility of social distancing in common areas
- Consider the direction of travel, pinch points (e.g. doorways, site access points), and gathering areas (reception area, changing rooms, elevators)
- Provide more storage for employees for clothes and bags
- Consider possible control measures:
 - Closing common areas
 - Changing area layout to create more space for movement
 - Marking on the ground to indicate the direction of travel
 - One way system may be needed where two-way systems are not possible
 - Only one person allowed in the elevator

Office areas

Considerations:

- Utilise home working as the first option where possible
- Measures should be implemented to maintain 2m distance (or 1m with risk mitigations where 2m is not viable)
- Reduce the number of employees in the office at any time
- Allow flexibility for when employees, who can work from home, need to be onsite and to go home as soon as that task is finished
- Where possible, move desks to ensure 2m distance, avoid face-to-face work and avoid adjacent desks
- Ensure facilities support following best hygiene practices
- Workstations should be assigned to an individual as much as possible. If they need to be shared they should be shared by the smallest possible number of people
- Consider the direction of travel and pinch points (e.g. doorways, site access points) within the office environment.



Canteens and lunch areas

Considerations:

- Encourage employees to bring their own food. If canteens are available, consider providing a takeaway service with pre-prepared and wrapped food only
- Stagger breaks and request employees to avoid having meals together
- Consider increasing the number or size of lunch areas available on site if possible
- The capacity of each canteen or rest area should be clearly identified at the entry to each facility, and where necessary attendants provided to supervise compliance with social distancing measures
- Drinking water should be provided with enhanced cleaning measures of the tap mechanism introduced
- Frequently clean surfaces that are touched regularly, using standard cleaning products e.g. kettles, refrigerators
- Hand cleaning facilities or hand sanitiser should be available at the entrance to any room where people eat and should be used by employees when entering and leaving the area
- All rubbish should be put straight in the bin and not left for someone else to clear up
- Tables should be cleaned between each use
- Crockery, eating utensils, cups etc. should not be used unless they are disposable or are washed and dried between uses
- Payments should be taken by contactless card wherever possible
- Canteen staff should wash their hands often with soap and water for at least 20 seconds before and after handling food.

Travelling to work

The Government has published [specific guidance](#) for travelling.

Considerations:

- Where possible, employees should travel to work in their own vehicles or means of transport
- If sharing transportation with others, employees should continue to share with the same individuals, maintain good ventilation, and ensure clean the vehicle regularly (especially the surfaces that are touched such as handles and steering wheel)
- Consider staggering site hours to reduce congestion and support maintain social distancing when arriving on site
- Be aware of any national guidance on the use of PPE and face covering on public transport
- If need be, consider temperature checking everyone who enters the site, at the entrances, and isolate and re-check those with a higher than normal temperature
- Consider the parking arrangements for additional cars and bicycles
- Guidelines should be considered for transporting employees home if they become unwell in the workplace with coronavirus symptoms.

Driving at work

If possible, travelling on sites should be reduced. If travelling at work or between site locations, employees should travel alone. If they have no option but to share a vehicle, then they should consider:

- Share with the same individuals and with the minimum number of people at any one time
- Wherever possible maintain a distance of 2m (or 1m with risk mitigation where 2m is not viable) and avoid touching their faces.
- Maintain good ventilation (i.e. keeping the windows open) and face away from each other during the journey
- Wash their hands for 20 seconds using soap and water (or hand sanitiser if soap and water are not available) before entering and after getting out of the vehicle
- Regularly clean the vehicle using gloves and standard cleaning products, with particular emphasis on handles and other surfaces which may be touched during the journey.

Site access

Considerations:

- Discourage employees from entering parts of the site unless essential to their role
- Consider the use of skype/phones/radio for communications where possible
- Consider whether the number of personnel be reduced in any area and whether the operations be split to carry out from different locations
- Plan site access and egress points to enable social distancing – there may be a need to change the number of access points, either increase to reduce congestion or decrease to enable monitoring, including in the case of emergencies
- Clear signage should be displayed at all access points stating how to gain access and about the 2m rule (or 1m with risk mitigations where 2m is not viable).

External visitors, contractors, and drivers

Considerations:

- Reduce external visitors/contractors onto the site, where possible, and create clear guidelines to manage and minimise the risk
- Revise visitor arrangements to ensure social distancing and hygiene, for example, where someone physically signs in with the same pen in receptions
- Create guidelines for external drivers getting out of their cabs and how restrictions are applied in what they do and whom they come into contact with
- Minimise contact between drivers and employees when loading/unloading and consider what can be done to protect both
- Replace delivery paperwork with digital versions
- Maintaining a record of all visitors, if practical
- Make provisions for the use of welfare facilities for external personnel and increase the cleaning of these facilities.

First aid and emergency service response

The Government has published [specific guidance](#) for first responders, which should be read in full.

- If needing to provide assistance to an individual who may have COVID-19, wherever possible, place the person in a place at least 2m away from others
- Use and dispose of all PPE according to the instructions and training previously provided by the employer and wash hands thoroughly with soap and water before putting on and after taking off PPE
- If required to perform CPR, conduct a risk assessment and adopt appropriate precautions for infection control. Where possible, it is recommended that not to perform rescue breaths or mouth-to-mouth ventilation; perform chest compressions only. If a decision is made to perform mouth-to-mouth ventilation in asphyxial arrest, use a resuscitation face shield where available, and monitor for symptoms of possible COVID-19 over the following 14 days
- Consider the impact of the measures in emergency situations and ensure Fire Risk Assessments are updated accordingly. In case of emergencies, be mindful of employees needing assistance when evacuating.

Maintaining adherence to new practices over time

Considerations:

- Be aware that compliance will drop over time
- Regularly refresh the information on new rules and measures to maintain an understanding
- Consult employees on how to maintain adherence and what can be done to ensure the new practice remained in place
- Audits of adherence could be a useful monitoring tool
- Reinforce sites rules by supervisors, contractor representatives, and visitor hosts, as soon as practical when people have entered the site.

Returning to work

It can be difficult to return to work from self-isolation, infection, or home working. The following should be considered:

- Be aware of any national guidance on returning employees
- Conduct return-to-work interviews to assess the employee, prepare them to come back and help monitor the situation. This can be done over the phone prior to their return to work
- Providing clear, consistent and regular communication to improve understanding and consistency of ways of working. Develop communication and training materials for employees prior to returning to site, especially around new procedures for arrival at work
- Consider gradually increasing attendance, area by area, to avoid all returning at the same time
- Consider travel to work limitations if many employees return at the same time
- Consider the mental health of returners and any perceived fears that they may have
- Consider the impacts of those returning on existing site arrangements, whether they are still valid, and whether they can still cope
- Consider the impact of returners on those at work.

Mental health

The COVID-19 pandemic can have a big impact on employees' mental health, with several considerations for supporting them:

- Supporting employees working from home and creating guidelines for new working patterns, additional communication, and support from their line managers
- Monitoring the well-being of people who are working from home and helping them stay connected to the rest of the workforce, especially if the majority of their colleagues are on-site
- Promote the mental health of employees during the pandemic and be mindful of the wider social and emotional impact of the pandemic
- The Government has issued guidance on the [mental health and wellbeing aspects of coronavirus \(COVID-19\)](#)
- The charity Mind offers [information on coronavirus and mental wellbeing as does the Every Mind Matters campaign.](#)

This Code of Practise has been developed with and supported by the steel Trade Unions:



This Code of Practice has been revised on 24 August 2020. It may be superseded by future Government guidance, which would take precedence.

UK Steel is the trade association for the UK steel industry and champions the country's steel manufacturers.

We represent the sector's interests to government and promote our innovative, vibrant and dynamic industry to the public.

Together, we build the future of the UK steel industry.

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