COVID19 Advice To SMEs

Employers have long had a duty to look after the safety, health and well-being of their staff and members of the public affected by their activities. With the advent of novel COVID-19, this duty extends to reducing the risks of people passing on and catching this new disease.

Employers should create plans to reduce the risk of people passing on and catching the virus and then implement them. In other words, they should do a risk assessment and introduce new controls. Employers with more than five employees should write down these plans, and, regardless of business size, they should be shared with all their staff. Ideally, they should also be published on the business website, and employers with over 50 employees are expected to do this.

Employers are more likely to devise more effective and practical control measures if they plan in meaningful consultation with their staff.

All businesses that have gone through this process are asked to complete and display a notice confirming that they have done so. The template of this notice can be found in the industry specific guides produced by the government.

The Hierarchy Of Control

Some control measures are more effective and easier to maintain than others. Different types of control strategies can be listed in descending order of effectiveness. This is known as the *hierarchy of control*. The categories are listed below in decreasing order of effectiveness:

- Eliminate the risk completely
- Substitute the risky activity or thing for something less risky
- Introduce engineering controls and changes to the physical workplace
- Introduce administrative controls, such as changing the way people behave (influenced by information, instruction and training), signage, HR procedures, etc.
- Provide personal protective equipment (PPE)

Controlling The Risk Of Coronavirus At Work

In regards to controlling the risks from coronavirus, the hierarchy of control might look something like the examples below, with the more effective controls at the top of the list. These ideas are not exhaustive, and no doubt you and your staff will think of other suitable controls applicable to your business:

Elimination - Stop It

- There may be some activities that by their nature can't be changed to make them safer, and you may decide to stop them for the time being until suitable controls become available or the national risk reduces.

Substitution - Do It In A Less Risky Way

- Keep staff working from home, if that's possible
- Determine which staff are at highest risk (clinically vulnerable and extremely clinical vulnerable) and plan with them how to keep them safe, ideally by working from home
- Deliver products and services in a different way that minimises contact between people
- Reduce the number of people in your buildings (by getting people to work remotely or using shift systems)
- Avoid face to face meetings and use alternative means of communication such as videoconferencing

Engineering Controls - Change The Physical Workplace Environment

- Use physical screens where staff are interacting with customers, such as at tills
- Use barriers to separate people
- Move office desks further apart so that workstations are separated by 2m or more
- Move workstations so that users aren't facing each other and are back to back or at ninety degrees to each other
- Provide additional wash hand basins
- Prop open (or introduce automatic opening devices on) non-fire doors so that people don't have to touch them

Administrative Controls - Change The Behaviour Of Your Staff And The Public

- Provide training to your staff
- Write and publish a modified procedure to say how you will do a task safely
- Introduce floor markings indicating 2m distance, for example in areas where queues form
- Provide signage and floor markings to create a one-way system for pedestrians
- Make it easy for staff to self-isolate if they become symptomatic by aligning your HR procedures around this goal

- Review cleaning schedules and enhance cleaning procedures where appropriate, particularly surfaces that come into regular contact with people (e.g. door handles of entry doors and lift call buttons)
- Reduce the need to share equipment

Provision Of PPE - The Last Resort

This is the least effective type of risk control for three reasons: people don't always remember to use them at appropriate times, they need to be worn correctly to be effective and, in the case of COVID19, we don't yet know how effective face coverings are in reducing transmission between people anyway. (It may turn out that droplets, produced by infectious people coughing or breathing, deposited on surfaces that are then picked up on hands, may be a more important source of passing on the disease.)

Nevertheless, if it is not possible to introduce other controls higher up the hierarchy, PPE is better than no control at all. It can also be used to complement activities where only administrative controls can be introduced. Typically PPE is used in settings where controls higher up the hierarchy can't be introduced due to the nature of the tasks involved, such as in medical and social care settings.

Plan, Do, Check, Act

Our knowledge of this new disease is improving, and government advice is evolving quickly. The management of the pandemic is likely to change as we learn more about it. After you implement your controls, you may find some work better than others. For all these reasons you should keep your plans under regular review to take account of changing advice and of your own experience of managing the risks. In other words:

- **Plan** what you will do to prevent transmission
- **Do** what you said you will do
- **Check** on the effectiveness of your controls
- **Act** upon what you find out from your checks

Further Information

The government has produced a range of industry-specific guidance for how to manage the risks of coronavirus transmission at work.

The Health & Safety Executive (HSE) has published more detailed guidance on how to conduct risk assessments of all kinds. They have also produced a leaflet on managing the risks of coronavirus at work and a leaflet about talking with staff to devise more effective controls.

The HSE has also published advice about taking care when reopening premises to manage the increased risks from legionella in hot and cold water systems and some ventilation systems.