

COVID-19 Risk Assessment (Factory 1, Factory 2, Eurohub and associated Processes)

Control Measures				Actions	Overall Risk
1.1: Managing Risk 1.2: Sharing the results of your risk assessment	9	0	0		Controlled
2.0: Who should go to work 2.1: Protecting people who are at higher risk 2.2: People who need to self-isolate 2.3: Equality in the Workplace	15	0	0		Controlled
3.0: Social Distancing at work 3.1: Coming to work and leaving work 3.2: Moving around building and worksites 3.3: Workplaces and workstations 3.4: Meetings 3.5: Common areas 3.6: Accidents, security and other incidents	36	0	0		Controlled
4.1: Manage contacts 4.2: Providing and explaining available guidance	7	0	0		Controlled
5.1: Cleaning the workplace (before opening) 5.2: Keeping the workplace clean 5.3: Hygiene - handwashing, sanitation facilities & toilets 5.4: Changing rooms and toilets 5.5: Handling goods, merchandise and other materials, and onsite vehicles	20	0	0		Controlled
6.0: Personal Protective Equipment (PPE) 6.1: Face coverings	2	0	0		Controlled
7.1: Shift patterns and working groups 7.2.1: Cars, accommodation and visits 7.2.2: Deliveries to other sites 7.3.1: Communication and Training (Returning to work) 7.3.2: Ongoing communications and signage	15	0	0		Controlled
8.0: Inbound and Outbound Goods	7	0	0		Controlled
Risk Assessor: Stephen Watson Group Health, Safety and Environment Manager	Date: 29th May 2020				
Address: Willow Road, Lenton, Nottingham NG7 2WS					

These control measures are based on the 'Working safely during COVID-19 in factories, plants and warehouses - Guidance for employers, employees and the self-employed' published 11th May 2020 by HM Government.

1.1 Managing Risk

Objective: To reduce risk to the lowest reasonably practicable level by taking preventative measures, in order of priority

In every workplace, increasing the frequency of hand washing and surface cleaning.	<p>All staff have been briefed on this measure, signage is in place throughout all buildings and operations across Lenton and managers are reinforcing the importance of the message.</p> <p>Surface cleaning requirements for each operational area are detailed in a Social Distancing Plan (SDP) completed by a Senior Manager for their particular area of control. These SDP's require approval from the Group HSE Manager, the General Counsel and the Global Head of People.</p> <p>Sufficient additional hand sanitiser and cleaning supplies and equipment is in place to allow this to be carried out.</p>
Businesses and workplaces should make every reasonable effort to enable working from home as a first option. Where working from home is not possible, workplaces should make every reasonable effort to comply with the social distancing guidelines set out by the government (keeping people 2m apart wherever possible).	Wherever possible staff are working from home. Where this is not possible, relevant Senior Managers have completed a SDP for their local area detailing all control measures to be implemented. These SDP's require approval from the Group HSE Manager, the General Counsel and the Global Head of People prior to staff returning to site.
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.	All activities that cannot be carried out with individuals remaining 2 metres apart will be reviewed to ascertain their criticality, and will only continue if they are deemed necessary. Only activities approved by the Group HSE Manager, the General Counsel and the Global Head of People via the SDP process will be permitted to be carried out.
Further mitigating actions include: <ul style="list-style-type: none">• Increasing the frequency of hand washing and surface cleaning.• Keeping the activity time involved as short as possible.• Using screens or barriers to separate people from each other.• Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.• Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others).	All mitigating actions described in this section are detailed in the individual SDP for each operational area.
Finally, if people must work face-to-face for a sustained period with more than a small group of fixed partners, then you will need to assess whether the activity can safely go ahead. No one is obliged to work in an unsafe work environment.	All tasks have been assessed as part of the individual SDPs and have been deemed safe to continue. Each SDP requires approval from the Group HSE Manager, the General Counsel and the Global Head of People.
In your assessment you should have particular regard to whether the people doing the work are especially vulnerable to COVID-19.	Prior to each member of staff returning to site they are assessed by the People Team with regards their vulnerability to the effects of COVID-19.

1.2 Sharing the results of your risk assessment

Objective: To reduce risk to the lowest reasonably practicable level by taking preventative measures, in order of priority

You should share the results of your risk assessment with your workforce.	The necessary actions identified as part of the risk assessment / SDP process, and documented via the SDP, have been shared with staff via the briefings, and reinforced during Managers walkarounds. The Risk Assessment has been published on the company intranet site as well as given to operational managers for more targeted dissemination as appropriate.
If possible you should consider publishing the results on your website (and we would expect all employers with over 50 workers to do so)	The results of the risk assessment have been published on the Company Website.
You should display the Staying COVID-19 Secure in 2020 document in your workplace.	The notices are on display on every entry into site and in other prominent positions throughout the site.

2.0 Who should go to work

Objective: That everyone should work from home, unless they cannot work from home

Considering who is essential to be on site; for example, office staff should work from home if at all possible.	Only staff who cannot carry out their role from home are permitted to be on site. Where it is not possible for staff to work from home, relevant Senior Managers have completed a SDP for their local area detailing all control measures to be implemented. These SDP's require approval from the Group HSE Manager, the General Counsel and the Global Head of People prior to staff returning to site.
Planning for the minimum number of people needed on site to operate safely and effectively.	The Site Support Senior manager has completed an SDP for the site to ensure that all relevant areas of site are managed and controlled appropriately. As part of this, we have increased Site Support resource (Cleaners, Engineers and Security) as required to maintain a safe and effective site.
Monitoring the well-being of people who are working from home and helping to stay connected to the rest of the workforce, especially if the majority of their colleagues are on-site.	Staff and Managers have been provided with guidance via intranet and email with regards maintaining their well-being whilst working from home. This will continue to be supplemented via regular communication from the People Team.
Keeping in touch with off-site workers on their working arrangements including their welfare, mental and physical health and personal security.	Managers have been provided with guidance via intranet and email with regards how they should keep in touch with and support staff working from home including consideration of staff members welfare, mental and physical health.

Providing equipment for people to work from home safely and effectively, for example, remote access to work systems.	Staff have been provided with computers and equipment to allow them to remotely access work systems. Staff continue to be supported by the IT and other support services whilst working from home.
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2.1 Protecting people who are at higher risk

Objective: To protect critically vulnerable and clinically extremely vulnerable individuals

Providing support for workers around mental health and wellbeing. This could include advice or telephone support	Staff and managers have been provided with guidance via intranet and email with regards maintaining staff well-being whilst working from home, including consideration of staff members welfare, mental and physical health.
See current guidance for advice on who is in the clinically extremely vulnerable and clinically vulnerable groups.	<p>Prior to each member of staff returning to site they are assessed by the People Team with regards their vulnerability to the effects of COVID-19.</p> <p>All staff who are clinically vulnerable, and clinically extremely vulnerable are not being asked to return to site. This is being reviewed on a case by case basis.</p>

2.2 People who need to self-isolate

Objective: That everyone should work from home, unless they cannot work from home

Enabling workers to work from home while self-isolating if appropriate.	Where possible, staff who are self-isolating are able to work from home.
See current guidance for employees and employers relating to statutory sick pay due to COVID-19.	All staff who have to self isolate are currently receiving full pay.
See current guidance for people who have symptoms and those who live with others who have symptoms.	All staff with symptoms, and those who live with others who have symptoms are not permitted on-site, and are sent home immediately if they develop symptoms whilst at work. They are not allowed to return to site until the appropriate self-isolation period has elapsed.

2.3 Equality in the workplace

Objective: To treat everyone in your workplace equally

Understanding and taking into account the particular circumstances of those with different protected characteristics	Managers take into account the particular circumstances of their staff members who have protected characteristics, and have the support of the People Team should they need additional advice or guidance.
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Involving and communicating appropriately with workers whose protected characteristics might either expose them to a different degree of risk, or might make any steps you are thinking about inappropriate or challenging for them.	Managers will involve and communicate appropriately with any staff members whose protected characteristics may present them with a different degree of risk. Managers have the support of the People Team and the HSE Team should they need additional advice or guidance.
Considering whether you need to put in place any particular measures or adjustments to take account of your duties under the equalities legislation.	Consideration will be made to any requests for changes in measures or adjustments to take into account our duties under the equalities legislation. Where possible changes will be made to suit the needs of the individual or groups
Making reasonable adjustments to avoid disabled workers being put at a disadvantage, and assessing the health and safety risks for new or expectant mothers	Reasonable adjustments would be made for any disabled workers who could be disadvantaged due to any new measures or processes implemented as part of COVID-19 protection. Due to new or expectant mothers currently being classed as clinically vulnerable they would not be allowed on site. Wherever possible they would be found alternative work to carry out from home.
Making sure that the steps you take do not have an unjustifiable negative impact on some groups compared to others, for example, those with caring responsibilities or those with religious commitments.	Where possible reasonable adjustments would be made for any workers who have other responsibilities or commitments.

3.0 Social Distancing at work

Objective: To maintain 2m social distancing wherever possible, including while arriving at and departing from work, while in work, and when travelling between sites.

You must maintain social distancing in the workplace wherever possible.

Measures to ensure staff remain socially distanced at all times are documented in the SDP for each operational area.

3.1 Coming to work and leaving work

Objective: To maintain social distancing wherever possible, on arrival and departure and to ensure handwashing upon arrival

Staggering arrival and departure times at work to reduce crowding into and out of the workplace, taking account of the impact on those with protected characteristics.

Where necessary and relevant, arrival and departure times have been staggered to both reduce crowding and to prevent cross-contamination between shifts.

Any staff member with protected characteristics who was adversely impacted would be consulted on a case-by-case basis.

Providing additional parking or facilities such as bike-racks to help people walk, run, or cycle to work where possible.	With occupancy on site currently well below normal levels, the existing facilities are adequate.
Limiting passengers in corporate vehicles, for example, work minibuses. This could include leaving seats empty.	Not applicable.
Reducing congestion, for example, by having more entry points to the workplace.	With site occupancy well below normal levels, the implementation of the one-way system and the staggering of shift start, finish and break times, congestion is not considered to be a significant issue.
Using markings and introducing one-way flow at entry and exit points.	All entry and exit points are clearly marked as either EXIT or ENTRY. All buildings have had a one-way system implemented, with briefings, maps and signage all in place to communicate this with staff.
Providing handwashing facilities, or hand sanitiser where not possible, at entry and exit points.	Hand Sanitiser is available at all frequently used ENTRY and EXIT points throughout the manufacturing and warehousing areas..
Providing alternatives to touch-based security devices such as keypads.	Security access is by use of an RFID card (no touch). Use of 'clocking-in' machines has been disbanded. Where alternatives are not possible, additional hand-washing / sanitisation points have been made available, and cleaning rota's have been increased.
Defining process alternatives for entry/exit points where appropriate, for example, deactivating pass readers at turnstiles in favour of showing a pass to security personnel at a distance.	The process of staff clocking in / out has been disbanded. Pass readers are contactless on exit doors, and we do not have turnstiles in place. Where alternatives are not possible, additional hand-washing / sanitisation points have been made available, and cleaning rota's have been increased.

3.2 Moving around building and worksites

Objective: To maintain social distancing wherever possible, while people travel through the workplace

Reducing movement by discouraging non-essential trips within buildings and sites, for example, restricting access to some areas, encouraging use of radios or telephones, where permitted, and cleaning them between use.	Most work is cell or local area based, with very little requirement for trips across buildings or sites.
Reducing job and equipment rotation.	This has been achieved wherever possible and documented in each individual SDP. Where equipment cannot be individually issued there is a requirement within the SDP to detail specific cleaning requirements.

Introducing more one-way flow through buildings.	All buildings have had a one-way system implemented, with briefings, maps and signage all in place to communicate this with staff.
Reducing maximum occupancy for lifts, providing hand sanitiser for the operation of lifts, and encouraging use of stairs wherever possible.	All lifts have been signed as having single occupancy.
Making sure that people with disabilities are able to access lifts.	Disabled access to all buildings has not changed due to any measures implemented.
Reducing occupancy of vehicles used for onsite travel, for example, shuttle buses.	The 'Site Van' has been designated single occupancy, staff with access to the vehicle have been briefed and a sign has been placed to that effect within the vehicle.
Regulating use of high traffic areas including corridors, lifts, turnstiles and walkways to maintain social distancing.	The design of the one-way system, the use of signage across the site, the staggered start / finish / break times and the monitoring of the overall site occupancy by the Site Support Senior Manager and the HSE team all contribute to regulating these areas to ensure Social Distancing remains in place.

3.3 Workplaces and workstations

Objective: To maintain social distancing between individuals when they are at their workstations

Reviewing layouts, line set-ups or processes to allow people to work further apart from each other.	Senior Managers, as part of the SDP process are required to review all layouts, set-ups and processes to ensure that people are adequately distanced. The SDP's are approved by the Group HSE Manager, the General Counsel and the Global Head of People.
Using floor tape or paint to mark areas to help workers keep to a 2m distance.	Floor markings have been used extensively throughout the site to indicate 2 metres distance.
Only where it is not possible to move workstations further apart, arranging people to work side by side or facing away from each other rather than face-to-face.	By their nature, the majority of workstations that are situated within 2 metres of each other were already side by side rather than face-to-face.
Only where it is not possible to move workstations further apart, installing screens to separate people from one another.	Where it is not possible to move stations appropriate screens have been installed to separate people from one another.
Using a consistent pairing system if people have to work in close proximity, for example, during two-person working, lifting or maintenance activities that cannot be redesigned.	Yes, where possible staff have been consistently paired to carry out these tasks, with both members of staff wearing suitable protective visors.

3.4 Meetings	
Objective: To reduce transmission due to face-to-face meetings and maintain social distancing in meetings	
Using remote working tools to avoid in-person meetings.	Extensive use of Google Hangouts and other video conferencing / messaging tools have been used to avoid the need for in-person meetings.
Only absolutely necessary participants should attend meetings and should maintain 2m separation throughout.	The majority of meetings are carried out using Google Hangouts (or similar messaging software). Start-of-shift briefings have been disbanded and have been replaced with instructions written on a white board or other suitable area, where staff need to carry out shift handovers, these are done at a distance of 2 metres.
Avoiding transmission during meetings, for example, from sharing pens and other objects.	Shared items have been identified, and their use minimised, through the individual SDP process.
Providing hand sanitiser in meeting rooms.	All meeting rooms are either locked shut and out of use, or have hand sanitiser provided within.
Holding meetings outdoors or in well-ventilated rooms whenever possible.	The location of meetings, should they be necessary, will always be considered and held either via Google Hangouts (or similar service) or in a well ventilated room wherever possible - and if held in person will always be carried out with all members remaining distanced by at least 2m.
For areas where regular meetings take place, using floor signage to help people maintain social distancing.	Regular face to face meetings are not taking place. Where face to face meetings are taking place, maximum occupancy controls are in place to enable appropriate distancing.

3.5 Common Areas	
Objective: To maintain social distancing while using common areas	
Staggering break times to reduce pressure on break rooms or places to eat.	Manufacturing and Warehousing staff are all staggering breaks to reduce pressure on break rooms. This is managed by a shared document owned and operated by the Site Support Senior Manager.
Using safe outside areas for breaks.	Outside areas, with seating, is available but is weather dependent.
Creating additional space by using other parts of the worksite or building that have been freed up by remote working.	If required, there are additional internal areas available for use as an eating/rest area.
Using protective screening for staff in receptions or similar areas.	The Security Office has a perspex screen around the reception desk.

Providing packaged meals or similar to avoid opening staff canteens, where possible.	This is not currently being provided, and the canteen remains closed for now.
Reconfiguring seating and tables to maintain spacing and reduce face-to-face interactions.	All tables have been suitably spaced to maintain 2 metre separation and have all been signed as single seated. All chairs, except one per table, have been removed.
Encouraging staff to stay on-site during working hours.	Not explicitly, but not considered a significant issue due to location.
Considering use of social distance marking for other common areas such as toilets, showers, lockers and changing rooms and in any other areas where queues typically form.	All toilets, showers and changing rooms have been designated as single occupancy and signed as such. The use of lockers in potentially congested areas has been disbanded, and in other areas forms part of standard 2 metre distancing.

3.6 Accidents, security and other incidents

Objective: To prioritise safety during incidents

In an emergency, for example, an accident, fire, or break-in, people do not have to stay 2 metres apart if it would be unsafe.	All Fire Wardens, and other relevant staff have been briefed that in the event of the evacuation alarm sounding then they should proceed out of their closest fire exit, they do not have to maintain 2 metre distancing and they do not have to follow the one-way system.
People involved in the provision of assistance to others should pay particular attention to sanitation measures immediately afterwards, including washing hands.	All first-aiders have been supplied additional visors and personal issue First Aid kits to reduce cross-contamination of items. CPR face masks have been made available at all defib stations and fixed First Aid points.

4.1 Manage Contacts

Objective: To minimise the number of unnecessary visits to factories, plants and warehouses

Encouraging visits via remote connection or remote working for visitors where this is an option.	Wherever possible, remote working instead of a visit in person is encouraged. As all visits require express permission of a member of the executive management team.
Limiting the number of visitors at any one time.	Not considered a significant issue due to relatively limited numbers of potential visitors at any one time.

Determining if schedules for essential services and contractor visits can be revised to reduce interaction and overlap between people, for example, carrying out services at night.	Both the necessity of the visit, and the operational considerations are all considered for each potential visit case by case, and all need express permission from a member of the executive management team.
Maintaining a record of all visitors, if this is practical.	All visitors are recorded using the Sateon system.

4.2 Providing and explaining available guidance

Objective: To make sure people understand what they need to do to maintain safety

Providing clear guidance on social distancing and hygiene to people, for example, inbound delivery drivers or safety critical visitors, on arrival, for example, signage, visual aids, and before arrival, for example, by phone, on the website, by email.	Process of identifying and informing external visitors of all relevant social distancing measures are covered in each individual SDP. Generally this involves briefing prior to arrival, re-iterations of measures upon arrival, and clear visual indicators of distancing requirements.
Establishing host responsibilities relating to COVID-19, providing any necessary training for people who act as hosts for visitors.	All staff who carry out inductions for external visitors, or act as hosts for such, have themselves been trained on all measures and are competent to deliver such training and induction. Operational Areas likely to receive visitors or deliveries have identified these on their local SDP.
Reviewing entry and exit routes for visitors and contractors to minimise contact with other people.	All visitors and contractors receive a site induction and would be required to follow the standard one-way system, unless specifically modified by individual requirements and documented / approved via the contractors RAMS document.
Coordinating and cooperating with other occupiers for those working in facilities shared with other businesses including with landlords and other tenants.	Not applicable.

5.1 Cleaning the workplace (before reopening)

Objective: To make sure any site or location that has been closed or partially operated is clean and ready to restart, including;

- **An assessment for all sites, or parts of sites, that have been closed, before restarting work**
- **Cleaning procedures and providing hand sanitiser, before restarting work**

Checking whether you need to service or adjust ventilation systems, for example, so that they do not automatically reduce ventilation levels due to lower than normal occupancy levels.	Advice has been received from accredited HVAC engineers and all recommendations have been implemented.
Most air conditioning systems do not need adjustment, however where systems serve multiple buildings or you are unsure, advice should be sought from your heating ventilation and air conditioning (HVAC) engineers or advisers.	Advice has been received from accredited HVAC engineers and all recommendations have been implemented.

Positive pressure systems can operate as normal.	Advice has been received from accredited HVAC engineers and all recommendations have been implemented.
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5.2 Keeping the workplace clean	
Objective: To keep the workplace clean and prevent transmission by touching contaminated surfaces	
Frequent cleaning of work areas and equipment between uses, using your usual cleaning products.	<p>Site Support cleaners will maintain general cleanliness as normal, and additional areas (handles, shared surfaces) as detailed in individual SDP's.</p> <p>Individual SDP's detail whether cleaning of specific items of equipment are the responsibility of the local area, the Site Support cleaners or a combination of the two.</p> <p>All staff have been briefed to report immediately any issues with general cleanliness and hygiene.</p>
Frequent cleaning of objects and surfaces that are touched regularly, such as door handles, pump handles and printers, and making sure there are adequate disposal arrangements	<p>Individual SDP's detail whether cleaning of shared surfaces are the responsibility of the local area, the Site Support cleaners or a combination of the two. Whoever is responsible, all such items are cleaned frequently.</p> <p>Processes are in place to collect refuse and waste as it is generated, so resource will be directed as required.</p> <p>Existing arrangements for waste disposal are currently adequate but will remain under review.</p>
Clearing workspaces and removing waste and belongings from the work area at the end of a shift.	All areas will continue to use existing 5S practice to maintain clear and tidy workspaces.
If you are cleaning after a known or suspected case of COVID-19 then you refer to the specific guidance.	Any cleaning carried out following a known or suspected case of COVID-19 would be carried out in line with government guidance.

5.3 Hygiene - handwashing, sanitation facilities and toilets	
Objective: To help everyone keep good hygiene through the working day	
Using signs and posters to build awareness of good handwashing technique, the need to increase hand washing frequency, avoid touching your face and the need to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.	Posters including all this information are in place throughout all buildings and operational areas across Lenton.

Providing regular reminders and signage to maintain hygiene standards.	All Senior Managers and Local Managers have been told to provide regular reminders to their staff regarding hygiene. Signage is also in place throughout all buildings at Lenton to remind staff.
Providing hand sanitiser in multiple locations in addition to washrooms.	Hand sanitiser is available throughout all buildings and operational areas across Lenton.
Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible.	All toilets have a regular cleaning schedule, and all staff have been briefed to report any issues immediately. All toilets are single occupancy with a procedure in place to indicate current occupancy.
Enhancing cleaning for busy areas.	All additional cleaning is detailed in individual SDP's.
Special care should be taken for cleaning of portable toilets	Portable toilets are cleaned to the same rota as normal toilets. All staff have been briefed to raise any issues immediately.
Providing more waste facilities and more frequent rubbish collection.	Processes are in place to collect refuse and waste as it is generated, so resource will be directed as required.
Where possible, providing paper towels as an alternative to hand dryers in handwashing facilities.	With all toilets being single occupancy this is not considered to be an issue.

5.4 Changing rooms and showers

Objective: To minimise the risk of transmission in changing rooms and showers

Where shower and changing facilities are required, setting clear use and cleaning guidance for showers, lockers and changing rooms to ensure they are kept clean and clear of personal items and that social distancing is achieved as much as possible.	All showers and changing facilities are single occupancy to ensure social distancing is achieved at all times. All such facilities are cleaned on a rota by Site Support Cleaners, with staff briefed to report any issues immediately.
Introducing enhanced cleaning of all facilities regularly during the day and at the end of the day.	All general facilities are cleaned on a rota by Site Support Cleaners, with staff briefed to report any issues immediately. All equipment and workstations are cleaned down at least at the start and end of each day, and in the case of shared equipment, before and after every use.

5.5 Handling goods, merchandise and other materials, and onsite vehicles

Objective: To reduce transmission through contact with with objects that come into the workplace and vehicles at the worksite

Cleaning procedures for the parts of shared equipment you touch after each use, thinking about equipment, tools and vehicles, for example, pallet trucks and forklift trucks.	The use of shared items is restricted wherever possible, and where not, cleaning procedures are in place. This is documented as part of the local SDP's.
Encouraging increased handwashing and introducing more handwashing facilities for workers handling goods and merchandise or providing hand sanitiser where this is not practical.	The importance of regular hand washing / sanitising is communicated to all staff via initial and refresher briefings, and through posters displayed around site. Additional hand sanitisation points have been provided where hand washing is not practical.
Regular cleaning of vehicles that workers may take home.	Not applicable
Regular cleaning of reusable delivery boxes.	All shared equipment is identified on local SDPs and cleaned down before and after every use.

6.0 Personal Protective Equipment (PPE) and face coverings

<p>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.</p> <p>Unless you are in a situation where the risk of COVID-19 transmission is very high, your risk assessment should reflect the fact that the role of PPE in providing additional protection is extremely limited. However, if your risk assessment does show that PPE is required, then you must provide this PPE free of charge to workers who need it. Any PPE provided must fit properly .</p>	<p>All controls detailed in local SDPs are based on the principles of keeping staff separated by a distance of 2m at all times, and only where this is not possible are physical barriers and / or screens installed.</p> <p>In very limited situations, where neither of these 2 options are possible, then staff occasionally have to work within 2 metres of one another. Where this occurs there are very strict controls in place, with the use of full face visors supplementing these measures.</p> <p>These situations are detailed and approved in the local SDP's where relevant, and are strictly limited to essential activities.</p>
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6.1 Face Coverings

There are some circumstances when wearing a face covering may be marginally beneficial as a precautionary measure. The evidence suggests that wearing a face covering does not protect you, but it may protect others if you are infected but have not developed symptoms.

Wearing a face covering is optional and is not required by law, including in the workplace. If you choose to wear one, it is important to use face coverings properly and wash your hands before putting them on and taking them off. Employers should support their workers in using face coverings safely if they choose to wear one. This means telling workers:

- Wash your hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and after removing it.
- When wearing a face covering, avoid touching your face or face covering, as you could contaminate them with germs from your hands.
- Change your face covering if it becomes damp or if you've touched it.
- Continue to wash your hands regularly.
- Change and wash your face covering daily.
- If the material is washable, wash in line with manufacturer's instructions. If it's not washable, dispose of it carefully in your usual waste.
- Practise social distancing wherever possible.

Face coverings are available for all staff, but are not mandatory and are not considered a control measure in any way. Staff are instructed that whilst wearing a face covering they must continue to follow all other controls measures described in the local SDP / induction.

The instructions given to staff when receiving face coverings cover each of the points listed here.

7.1 Shift patterns and working groups

Objective: To change the way work is organised to create distinct groups and reduce the number of contacts each worker has

As far as possible, where people are split into teams or shift groups, fixing these teams or shift groups so that where contact is unavoidable, this happens between the same people.

All operational areas that work in this way will keep, as far as possible, shift make-up static. This is detailed in each individual SDP where relevant.

Identifying areas where people have to directly pass things to each other, for example, job information, spare parts, samples, raw materials, and find ways to remove direct contact, such as through the use of drop-off points or transfer zones.

All working practices that involve items being passed amongst individuals are identified as part of the initial SDP process with alternatives implemented wherever possible. Where not possible, additional hand washing / sanitisation is in place.

Where necessary, processes are improved based on staff feedback / manager observations with all amendments to the SDP requiring approval from a relevant Senior Manager and the Group HSE Manager.

7.2.1 Work-related travel (Cars, accommodation and visits)

Objective: To avoid unnecessary work travel and keep people safe when they do need to travel between locations.

Minimising non-essential travel – consider remote options first.	All non-essential travel has been stopped.
Minimising the number of people travelling together in any one vehicle, using fixed travel partners, increasing ventilation when possible and avoiding sitting face-to-face.	We do not have any staff travelling together for work purposes, but have issued staff with advice regarding travel to and from work.
Cleaning shared vehicles between shifts or on handover.	The site-van is cleaned down after use, and is primarily only used by a single member of staff. Mechanical Handling Equipment (Fork Trucks, Very Narrow Aisle Trucks etc) are addressed within local SDPs.
Where workers are required to stay away from their home, centrally logging the stay and making sure any overnight accommodation meets social distancing guidelines.	Not applicable.

7.2.2 Work-related travel (Deliveries to Other Sites)

Objective: To help workers delivering to other sites such as factories, logistics sites or customers' premises to maintain social distancing and hygiene practices

Putting in place procedures to minimise person-to-person contact during deliveries to other sites.	Not applicable - we do not deliver to other sites, this is conducted by third parties.
Maintaining consistent pairing where two-person deliveries are required.	Not applicable.
Minimising contact during payments and exchange of documentation, for example, by using electronic payment methods and electronically signed and exchanged documents.	Not applicable - we do not deliver to other sites, this is conducted by third parties.

7.3.1 Communication and Training (Returning to Work)

Objective: To make sure all workers understand COVID-19 related safety procedures

<p>Providing clear, consistent and regular communication to improve understanding and consistency of ways of working.</p>	<p>All staff receive an initial briefing carried out in person by an appropriate manager.</p> <p>Each SDP is required to detail how managers will stay in contact with staff, for example regular walk-arounds. There is also clear signage throughout site explaining measures.</p> <p>The H&S Team, and H&S Representatives are also available to communicate and discuss any control measures or suggested changes.</p>
<p>Engaging with workers and worker representatives through existing communication routes to explain and agree any changes in working arrangements.</p>	<p>All Managers have regular contact with staff with the purpose of eliciting feedback and to discuss improvements / changes to working methods.</p> <p>The H&S Team, and H&S Representatives are also available to communicate and discuss any control measures or suggested changes.</p>
<p>Developing communication and training materials for workers prior to returning to site, especially around new procedures for arrival at work.</p>	<p>All Managers are required to develop a briefing document which they use to train staff on all new procedures prior to starting work. All staff have to acknowledge understanding of this document, and this acknowledgement is recorded.</p>

7.3.2 Communication and Training (Ongoing communications and signage)

Objective: To make sure all workers are kept up to date with how safety measures are being implemented or updated

<p>Ongoing engagement with workers, including through trades unions or employee representative groups to monitor and understand any unforeseen impacts of changes to working environments.</p>	<p>Managers are conducting regular walk arounds on the shop floor talking to staff members about any impacts they are experiencing, and discussing any ideas for improvements.</p> <p>All managers understand the importance of staff engagement and routinely consult with staff as part of their regular walk arounds.</p> <p>The H&S Team, and H&S Representatives are also available to promote staff engagement, and communicate and discuss any control measures or suggested changes.</p>
<p>Awareness and focus on the importance of mental health at times of uncertainty. The government has published guidance on the mental health and wellbeing aspects of coronavirus (COVID-19).</p>	<p>A staff well-being page has been set-up on the dedicated COVID-19 page on the company intranet. This addresses the importance of mental health.</p> <p>Regular communications from the People Team to all staff frequently refer to the importance of well-being, and provide practical advice on how to maintain well-being during this pandemic.</p>

Using simple, clear messaging to explain guidelines using images and clear language, with consideration of groups for which English may not be their first language.	<p>Signage is written in simple, clear language, with use of clear colour indications wherever appropriate.</p> <p>All instructions and briefings are carried out in small groups with staff members to allow the Manager conducting the briefing to carry out practical demonstrations, and to enable them to assess whether or not the message has been understood.</p> <p>All staff have to acknowledge understanding of their return to work briefing, and this acknowledgement is recorded.</p>
Using visual communications, for example, whiteboards or signage, to explain changes to production schedules, breakdowns or materials shortages to reduce the need for face-to-face communications.	<p>Staff allocation / work instructions are, wherever possible, communicated via messages written on whiteboards or other similar equipment.</p> <p>Where staff do need to carry out face-to-face handovers, these are done at a distance of 2 metres.</p>
Communicating approaches and operational procedures to suppliers, customers or trade bodies to help their adoption and to share experience.	All regular visitors to site, for example third party logistics and external maintenance engineers are briefed prior to attending site by email, and given an individual briefing on their arrival at site.

8.0 Inbound and outbound goods

Objective: To maintain social distancing and avoid surface transmission when goods enter and leave the site, especially in high volume situations, for example, distribution centres, despatch areas

Revising pick-up and drop-off collection points, procedures, signage and markings	For all pick-up and drop-off collection points, procedures have been reviewed and updated, and appropriate signage and markings have been introduced.
Minimising unnecessary contact at gatehouse security, yard and warehouse. For example, non-contact deliveries where the nature of the product allows for use of electronic pre-booking.	Contact between drivers, gatehouse security and warehouse operatives has been minimised as far as possible, with drivers briefed to remain in the cab of the vehicle except when carrying out key-surrender or sheeting / un-sheeting.
Considering methods to reduce frequency of deliveries, for example by ordering larger quantities less often.	The frequency of deliveries is minimised wherever possible across site. All inbound deliveries from third party logistics are full containers, and daily collections for outbound are likewise wherever possible.
Where possible and safe, having single workers load or unload vehicles.	All vehicles are loaded / unloaded using a single staff member.
Where possible, using the same pairs of people for loads where more than one is needed.	Not required, single loading only.

<p>Enabling drivers to access welfare facilities when required, consistent with other guidance.</p>	<p>Drivers are able to use the welfare facilities, if required, to the same extent as they were pre-COVID. All drivers are briefed on, and are required to follow all social distancing measures in place at all times.</p>
<p>Encouraging drivers to stay in their vehicles where this does not compromise their safety and existing safe working practice, such as preventing drive-aways.</p>	<p>All drivers are required to stay in their vehicles as far as possible, only exiting to deposit keys and to sheet/unsheet the lorry. They are briefed to this effect via intercom when they arrive at site.</p>