Working on site during the COVID-19 pandemic: Construction Guidance

Introduction

All construction sites operating during the COVID-19 pandemic need to ensure they are following the latest guidance from NHS Scotland and the Scottish Government, including physical (social) distancing and stay at home advice. Information to help protect the workforce and minimise the risk of spread of infection is available on NHS Inform and in ‘COVID-19 Guidance for non-Healthcare Settings.’ For up-to-date advice visit here.

This guidance is intended to ensure the adoption of appropriate measures on sites of all sizes, in line with current recommendations on physical (social) distancing.

Notwithstanding anything contained in this document, all contractors and personnel must comply with the latest Scottish Government advice or direction on the prevention of spread of Coronavirus at all times.

This document is up to date as at 28/05/20. The latest version of this document can be found here.

This guidance does not supersede any legal obligations relating to health and safety, employment or equalities and it is important that as a business or an employer you continue to comply with your existing obligations, including to those individuals with protected characteristics.

If an activity cannot be undertaken safely due to a lack of suitably qualified personnel or supporting resources required to provide a safe system of work, it must not take place.

Site access, layout, welfare facilities, logistics and operations, etc., must be risk assessed and planned to ensure that physical (social) distancing and enhanced hygiene recommendations can be followed. If there are operations essential to completion of the project that cannot be undertaken within the parameters of physical (social) distancing, then they must not take place until a specific risk assessment has been completed and appropriate control measures implemented (refer to section ‘Development of controls’).

For information on working within domestic premises, reference should be made to the CICV Forum document “Work to be carried out in domestic premises”
Development of controls

The Health and Safety at Work etc Act 1974, the Management of Health & Safety at Work Regulations 1999, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Construction (Design and Management) Regulations 2015 and other relevant legislation continue to apply to any construction project carried out during the COVID-19 pandemic.

All contractors, or principal contractors, have a duty to take account of the health and safety risks to everyone affected by the work (including members of the public) in planning, documenting and managing the measures needed to control those risks. Risk assessment and the communication and implementation of appropriate control measures is a fundamental requirement of the above legislation.

Such measures need to take into account the nature of the site, the work to be performed, the number of people working on the site and other local factors and be documented in a Construction Phase Plan, including risk assessments and method statements (RAMS).

Employers have a duty to consult their people on health and safety. You can do this by listening and talking to them about the work and how you will manage risks from COVID-19. The people who do the work are often the best people to understand the risks in the workplace and will have a view on how to work safely.

Involving them in making decisions shows that you take their health and safety seriously.

You must consult with the health and safety representative selected by a recognised trade union or, if there isn’t one, a representative chosen by workers. As an employer, you cannot decide who the representative will be.

Risk Assessments

The specific risks of working during the COVID-19 pandemic and the associated control measures, including physical (social) distancing requirements, must therefore be considered and documented in Risk Assessments by duty holders, in compliance with their normal health and safety management procedures. Such risk assessments need to be written down unless an employer has less than 5 workers or is self-employed.

Should an operation (essential to the project) be identified in a Risk Assessment that would not normally be undertaken within the parameters of physical (social) distancing, contractors must first of all seek to Eliminate the risk by looking for other ways to complete the task whilst complying with social distancing. If this is not practicable, they must seek to Substitute the risk by changing the means used to carry it out; to apply Engineering Controls, for example by erection of a screen or barrier and/or to introduce strictly enforced Administrative Controls, such as reducing the frequency and time workers need to be within 2m of one another.
Where reliance is placed solely on Administrative Controls, then an appropriate form of specialist PPE should be used to protect workers from infection. Physical (social) distancing should be adhered to as far as possible and the period of time and frequency at less than 2m distancing should be minimised.

Documenting the measures required in method statements can help and the workforce should be provided with appropriate information, instruction and (where necessary) training to ensure they understand what to do. Toolbox talks could aid such briefing.

A typical hierarchy of controls is illustrated above and a more detailed example is provided in Annex A.

For non-essential projects only, during the period when supplies of PPE to the NHS and care home staff are under significant pressure, the industry should not employ the option of using “medical style” PPE (such as Fluid Resistant Surgical Masks, FF2 or FF3 respirators and visors) to allow completion of work that cannot be carried out whilst following physical distancing or using a barrier. During this period such work will not be carried out unless and until other methods of completion become available or the “medical style” PPE supply situation stabilises.
Information and Guidance on the risk posed by COVID-19 and potential control measures


For updated guidance visit here.

What is the risk of COVID-19?

This considers the risk is of site personnel, visitors or the general public contracting the coronavirus COVID-19.

COVID-19 is spread by droplets. This is most likely to happen when there is close contact (within 2 metres) with an infected person. It is likely that the risk of infection transmission increases the longer someone has close contact with an infected person. Respiratory secretions, from the coughs and sneezes of an infected person are most likely to be the main means of infection transmission.

There are two routes by which COVID-19 can be spread:

- Indirectly: by touching a surface, object or the hand of an infected person that has been contaminated with respiratory secretions and then touching own mouth, nose, or eyes.
- Directly: from close contact with an infected person (within 2 metres) where respiratory secretions can enter the eyes, mouth, nose or airways. This risk increases the longer someone has close contact with an infected person who has symptoms.

How long can the virus survive on environmental surfaces?

This depends on a number of factors. For example the surface the virus is on; whether that surface is exposed to sunlight; environmental conditions such as temperature and humidity; and exposure of the surface to decontamination products e.g. detergents and disinfectants.

Under most circumstances, the amount of infectious virus on any contaminated surfaces is likely to have decreased significantly by 72 hours. We know that similar viruses, are transferred to and by people’s hands and therefore frequent hand hygiene and regular decontamination of frequently touched environmental and equipment surfaces will help to reduce the risk of infection transmission.
General advice on control measures applicable to all work sites.

All sites should have measures in place for the following tasks or considerations:

- Site managers should consider the number of people that are required on site at any time and ensure that workers are aware of the advice on COVID-19.
- Routine cleaning and disinfection of frequently touched objects and surfaces (e.g. telephones, keyboards, door handles, desks and tables).
- Ensure regular environmental cleaning is done.
- Promote frequent hand hygiene by making sure that staff, contractors, service users and visitors have access to hand washing facilities and where available alcohol-based hand rub.
- Ensure staff have the space to allow for appropriate distancing between colleagues when working/moving around. This can include marking on the ground to encourage people to stand 2m back from staff and ensuring staff have appropriately staggered breaks.
- Ensure good ventilation by keeping windows open where possible and not closing doors for small rooms (unless someone is presenting symptoms – see the later section in this document regarding responding to someone falling ill at work).
- Individuals should
  - Wash hands frequently with soap and water for 20 seconds.
  - Use alcohol-based hand rub where available if no access to soap and water.
  - Avoid touching eyes, nose and mouth with unwashed hands.
  - Not come to work if they or a household member has symptoms of COVID-19 (follow the stay at home guidance).
  - Follow the physical (social) distancing advice.
  - Wherever possible, avoid direct contact with people that have a respiratory illness and avoid using their personal items such as their mobile phone.
  - Cover the nose and mouth with a disposable tissue when sneezing, coughing, wiping and blowing the nose. Dispose of all used tissues promptly into a waste bin. If you don’t have any tissues available, they should cough and sneeze into the crook of their elbow.
Specific advice on control measures to be considered for inclusion in site specific Risk Assessments for COVID-19, dependent upon the size of project and the number of personnel involved

Provision of information and guidance

This document sets out guidance on how to work safely. It gives practical considerations of how this can be applied in the workplace. Each business should translate this into the specific actions it needs to take depending upon the nature of their business, including the size and type, how it is organised, operated, managed and regulated.

Businesses should also act on any relevant and appropriate advice that has been produced specifically for their sector by trade associations or trades unions.

The results of any COVID-19 risk assessment (including dynamic and ongoing risk assessments) should be shared with the workforce, together with clear, consistent and regular communication to improve understanding and consistency in ways of working.

Feedback on risk assessments and method statements and any resulting adjustments to site operations should be addressed by daily briefings to site supervisors, given by a designated member of the site management team.

Contractors and Principal Contractors should ensure that every worker is reminded that they have a right not to go on to the site if they feel it is not safe to do so and check that none have been forced to come to work by their employer.

Provision of enhanced supervision

During early phases of the return to work reduced ratios of workers to supervisors will be required to ensure effective monitoring and supervision of implementation of the new controls, to gather feedback from the workforce on their effectiveness and to help develop a dynamic response to the changes.

Provision of cleaning products

Before commencing any works, all necessary cleaning products, including soap and water and alcohol-based hand rub (where available) must be available to every worker. If this is not the case, then work should not commence until resolved.
Hand Washing

- Provide additional hand washing facilities to the usual welfare facilities if a large spread out site or significant numbers of personnel on site.
- Ensure soap, clean hot and cold (or warm) running water and disposable hand towels are readily available and kept topped up at all times.
- Provide alcohol-based hand rub where hand washing facilities are unavailable.
- Regularly clean the hand washing facilities and check soap and alcohol-based hand rub levels.
- Provide suitable and sufficient rubbish bins for hand towels with regular removal and disposal. Sites will need extra supplies of soap, alcohol-based hand rub and paper towels and these should be securely stored.

Cleaning

Enhanced cleaning procedures must be in place across the site, particularly in communal areas and at touch points including, where applicable:

- Taps and washing facilities
- Toilet flush and seats
- Door handles and push plates
- Handrails on staircases and corridors
- Lift and hoist controls
- Machinery and equipment controls and vehicle cabs
- Food preparation and eating surfaces
- Telephone equipment
- Keyboards, photocopiers and other office equipment
- Rubbish collection and storage points should be increased and emptied regularly throughout and at the end of each day
- Task appropriate glove wearing is mandatory
- Tools – sharing of tools to be prohibited unless specialist PPE used or tools are disinfected before use by anyone else.

Maintenance of a stock of consumables to maintain cleanliness is essential
Travel to Site

- Wherever possible workers should travel to site alone using their own transport and sites must consider, where necessary:
  - Parking arrangements for additional cars
  - Other means of transport to avoid public transport, such as providing additional bike racks
  - If workers have no option but to share, journeys should be with the same individuals and with the minimum number of people at any one time.
  - Passenger numbers in corporate vehicles (such as minibuses) should be limited to permit 2m physical distancing.
  - Ventilation should be increased (for example, by keeping windows open) and passengers should avoid sitting face to face.
- Vehicles should be cleaned regularly (between shifts or on handover) using gloves and standard cleaning products, with an emphasis on handles and other touch surfaces.
- Where public transport is the only option for workers, you should consider:
  - Changing and staggering site hours to reduce congestion on public transport
  - Avoiding requiring workers to use public transport during peak times.
  - Where compounds are established, providing hand cleaning facilities at entrances and exits. This should be soap and water wherever possible or alcohol-based hand rub when water is not available.
  - How someone taken ill would get home.

Site Access Points

- Stop all non-essential visitors (i.e. those whose presence is not essential for the management and safe operation of the site).
- Issue specific guidance for deliveries.
- On larger sites introduce staggered start and finish times to reduce congestion and contact at all times. (This may also assist in spreading load on nearby public transport).
- Where feasible, monitor site access points to enable physical (social) distancing – you may need to change the number of access points, either increase to reduce congestion or decrease to enable monitoring. Also implement where reasonable one-way entry and exit.
- Remove or disable entry systems that require skin contact e.g. fingerprint scanners.
- Require all workers to wash or clean their hands before entering and leaving the site.
- Allow plenty of space (two metres) between people waiting to enter site.
- Regularly clean common contact surfaces in reception, office, access control and delivery areas e.g. scanners, turnstiles, screens, telephone handsets, desks, particularly during peak flow times.
- Drivers should remain in their vehicles if it is safe to do so and must wash or clean their hands before and after unloading goods and materials.
- Fire evacuation procedures – consideration to be given to how to quickly evacuate and how to maintain distance at a muster point.
Movement around the site

- Reduce the need for movement around the site where reasonable by re-planning logistics and layout of site facilities.
- Reduce the number of people in attendance at site inductions.
- Induction rooms must be carefully managed to ensure physical (social) distancing or inductions held on site in open air if possible. Adoption of ‘Honda factory’ 2m grid for all briefings etc.
- One-way systems – introduce one way flow of people around the workplace in stairs and corridors where reasonable.
- Perimeter Access Scaffolding - consider one-way systems for vertical travel additional stair towers to be installed.
- This will require effective communication to all on site.
- Toolbox talks – daily toolbox talks on COVID-19 to reiterate site operating procedures and inform of any change to site procedures.

Toilet Facilities

- Restrict the number of people using toilet facilities at any one time - “one in/one out.” controls must be used. The number of toilets may need to increase to permit this.
- Wash hands using soap and water before and after using the facilities.
- Enhance the cleaning regimes for toilet facilities particularly door handles, locks and the toilet flush.
- Portable toilets should be cleaned and emptied more frequently.
- Provide suitable and sufficient rubbish bins for hand towels with regular removal and disposal.

First Aid on site

Consider how to be prepared to provide first aid to a person who may become injured due to a work activity – including protection of both the worker and the first aider(s) and the appropriate specialist PPE required. People involved in the provision of assistance to others should pay particular attention to sanitisation measures immediately afterwards, including washing hands.

Canteens and Eating Arrangements

There is a requirement under the CDM Regs for suitable arrangements so that meals can be prepared and eaten and that includes a means for boiling water. The site cleaning regime will need to be able to ensure that these arrangements can be kept clean between uses. The workforce should be required to stay on site once they have entered it.

- Dedicated eating areas should be identified on site to reduce contamination.
- Break times should be staggered to reduce congestion and contact at all times.
• Hand cleaning facilities or alcohol-based hand rub should be available at the entrance of any room where people eat and should be used by workers when entering and leaving the area.
• Workers should sit 2 metres apart from each other whilst eating and avoid all contact (additional canteen facilities may be necessary).
• Where catering is provided on site, it should provide pre-prepared and wrapped food only.
• Payments should be taken by contactless card wherever possible.
• Crockery, eating utensils, cups etc. should not be reusable.
• Drinking water should be provided with enhanced cleaning measures of the tap mechanism introduced.
• Tables should be cleaned between each use.
• All rubbish should be put straight in the bin and not left for someone else to clear up.
• All areas used for eating must be thoroughly cleaned at the end of each break and shift, including chairs, door handles, vending machines and payment devices.

Attendants, where employed, should be trained to fulfil the role of ensuring that social distancing is achieved in the canteen areas.

Changing Facilities, Showers and Drying Rooms (where required)

• Introduce staggered start and finish times to reduce congestion and contact at all times.
• This may require “one in/one out” arrangements dependent upon the size of unit.
• Introduce enhanced cleaning of all facilities throughout the day and at the end of each day.
• Consider increasing the number or size of facilities available on site if possible.
• Based on the size of each facility, determine how many people can use it at any one time to maintain a distance of two metres.
• Provide suitable and sufficient rubbish bins in these areas with regular removal and disposal.
• Keep such facilities clear of personal items.

Working in teams

It is important, particularly for those who may need to engage in close working following a risk assessment, to reduce the number of people that each person has contact with on site. This may be achieved by using fixed teams or shifts or partnering so each person works with only a few others.
Site Meetings

- Only absolutely necessary meeting participants should attend.
- Use Skype, facetime, etc to avoid unnecessary visitors to site and reduce travel around the site.
- Attendees should follow physical (social) distancing and be two metres apart from each other.
- Rooms should be well ventilated/windows opened to allow fresh air circulation.
- Hold meetings in open areas where reasonable.
- Where visitors are required, limit the number at any one time and explain site guidance on social distancing and hygiene on or before arrival.

Use of specialist PPE

The role of PPE in providing additional protection against COVID-19 transmission is limited and controls should first of all focus on ensuring hygiene, particularly handwashing, maintaining physical distancing, minimising time and using fixed teams when working in close contact. However, in circumstances where a risk assessment has shown that a task essential to a project cannot be carried out in a socially distanced manner, a barrier is not a practical solution and reliance is placed solely on administrative controls, then, as a last resort, an appropriate form of PPE should be used.

As described earlier, however, during any period when the supply of such “medical” PPE is restricted, the industry will not make use of such PPE (other than for providing first aid) and will defer the completion of any work that cannot be carried out using physical distancing or a barrier.

Self-isolation & Shielding
(Advice from NHS Inform – please check for the latest guidance)

Anyone who meets one of the following criteria should not come to site:

- People who have symptoms of COVID-19, or are household members of people with symptoms, must stay at home and follow the guidance for households with possible coronavirus infection on NHS Inform.
- People who are shielding, designated as “at very high risk”, must not attend any workplace outside the home setting – see NHS Inform.”
Procedure if someone falls ill

If a worker develops a high temperature or a persistent cough while at work, they should:

• Return home immediately.
• The use of public transport should be avoided.
• Avoid touching anything.
• Cough or sneeze into a tissue and put it in the bin, or if they do not have tissues, cough and sneeze into the crook of their elbow.
• They must then follow the guidance on NHS Inform and not return to work until their period of self-isolation has been completed.
• Contact to be made with next of kin.
• Advise Employer of developing condition.
• If the worker is so unwell that they require an ambulance, phone 999 and let the call handler know you are concerned about COVID-19. Whilst you wait for advice or an ambulance to arrive, try to find somewhere safe for the unwell person to sit which is at least 2 metres away from other people.
• If possible, find a room or area where the worker can be isolated behind a closed door, such as a staff office or meeting room. If it is possible to open a window, do so for ventilation. The worker should avoid touching people, surfaces and objects and be advised to cover their mouth and nose with a disposable tissue when they cough or sneeze, and then put the tissue in the bin. If no bin is available, put the tissue in a bag or pocket for disposing in a bin later. If you don’t have any tissues available, they should cough and sneeze into the crook of their elbow.

Once the worker has left the premises, the immediate area occupied by the individual should be cleaned with detergent and disinfectant.

Additional information is available at ‘COVID-19 Guidance for non-Healthcare Settings.’

HSE Advice

The HSE have set up a whistle-blowing line which can be found on: https://www.hse.gov.uk/contact/concerns.htm

HSE have also provided the following advice on how to raise a concern:

• Contact your employee representative
• Contact your trade union if you have one
• Contact the HSE at:

HSE COVID-19 enquiries
Telephone 0300 790 6787 (Mon-Fri 8.30am to 8.00pm)
Contact form
Annex A: Work planning to avoid Close Working

All sites need to be reviewed to see how they need to be reconfigured to permit physical distancing wherever possible and maintain hygiene.

All activities need to be risk assessed to see how they can be safely carried out whilst maintaining physical distancing. If an activity (or sub-activity) cannot be carried out whilst maintaining physical distancing then it must be assessed to determine whether it is essential to completion of the project.

If it is essential, then a risk assessment must be carried out, following a hierarchy of controls

Hierarchy of controls

The following table describes a typical hierarchy of controls and defines typical actions that can be taken to mitigate risk at each stage in an activity risk assessment. Sub-sector specific guidance should be referred to when considering the range of potential controls available.

<table>
<thead>
<tr>
<th>Hierarchy</th>
<th>Potential controls</th>
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<tbody>
<tr>
<td>Elimination</td>
<td>Remove the hazard by, for example, re-designing or re-specifying the product or by delaying until the risk has passed</td>
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<tr>
<td>Substitution</td>
<td>Rearrange tasks or find new methods or equipment to enable tasks to be done by one person, or whilst maintaining physical distancing</td>
</tr>
<tr>
<td>Engineering Controls</td>
<td>Consider whether a physical barrier can be provided to isolate people from the hazard</td>
</tr>
<tr>
<td>Administrative Controls</td>
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  - Minimise the time workers are within 2 metres  
  - Minimise the frequency of work at less than 2m  
  - Work to be carried out side by side or back to back, rather than face to face  
  - Keep groups of workers that have to work within 2m:  
    - Together in teams (i.e. do not change team members)  
    - In small teams  
    - Away from other workers where possible  
  - Provide additional supervision to monitor and manage compliance  
  - Introduce an enhanced authorisation process for those activities |
| PPE            | Where reliance is placed solely on the use of Administrative Controls, then appropriate additional PPE should be provided to all workers who need it and must be free of charge.  
  - Reusable PPE must be thoroughly cleaned after use and not shared between workers |
• Single use PPE should be disposed of so that it cannot be reused.

| Discipline and behaviours | The measures necessary to minimise the spread of infection rely on everyone in the industry taking responsibility for their actions and behaviours. Please encourage an open and collaborative approach between workers and employers on site where any issues can be openly discussed and addressed. |

Annex B: Construction Restart Model can be found [here](#).

This guidance has been produced by Construction Scotland in collaboration with Scottish Government and the construction industry.