



## Post-coronavirus start-up guidance: Manufacturing sector

Some businesses may now be permitted to reopen following the enforced Covid-19 partial, or full, shutdown. In many cases business owners and staff will be returning to work and their premises for the first time in weeks.

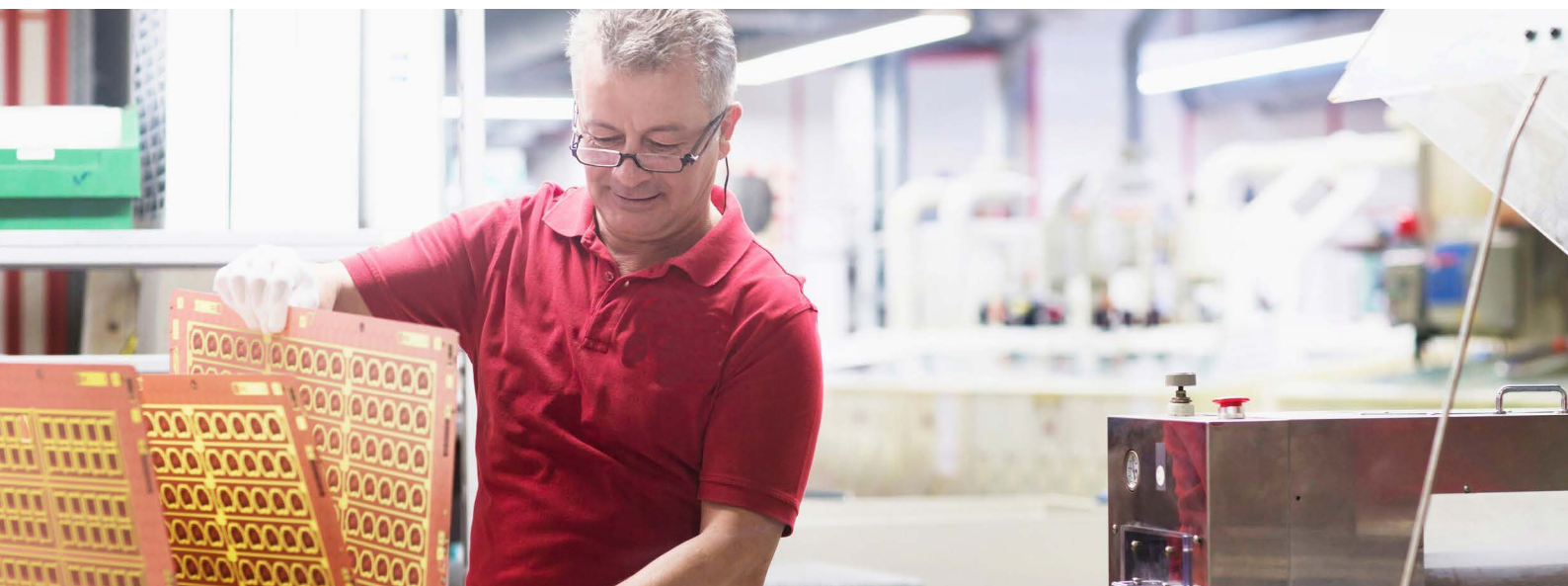
Reopening the business for trading and activating building services, plant and machinery needs to be planned to resume activities in a controlled and safe manner. Each business will need to be individually risk assessed to establish specific needs, and the guidance given below covers some of the main areas to consider.

### **These guidelines do not override any existing policy conditions.**

All applicable health & safety legislation and regulations remain fully in force, including but not limited to:

- Health & Safety at Work Act 1974.
- Management of Health & Safety at Work Regulations 1999.
- Workplace (Health, Safety & Welfare) Regulations 1992.
- Fire Safety Regulatory Reform Order.

**The fact that a business is deemed essential, or is permitted to operate, does not mean its legal obligations are in any way relaxed or reduced. Indeed, in the present climate the duties owed to employees and others are enhanced. All activities must only be undertaken in line with the current guidance issued by HM Government.**





# Coronavirus Response

## Risk management measures

**Activities: First and foremost, customer and employee safety is paramount.** It is important that a review of your working activities is undertaken before restarting any work, as this will form part of your Covid-19 Compliance risk assessment. You must carry out a suitable and sufficient risk assessment - this means looking at working areas and activities to enable your employees to successfully distance themselves from customers and colleagues and work safely. It may not be appropriate to carry out certain activities as you normally would, and / or you may need to consider supplying PPE equipment to certain employees. Please see the latest Government and HSE advice for updates on appropriate precautions.

**Please remember that if some activities cannot be carried out safely, they should not be undertaken at all.**

You must reinduct your employees to ensure that they understand new restrictions, new rules, and altered arrangements for using welfare facilities, and you may need to operate out of hours and/or, introduce shift patterns in order to manage safely the social distancing elements of the Covid-19 guidelines.

**Please click on the headings below for links to further information:**

[Social Distancing in the Workplace Guidelines](#)

[HSE Coronavirus information](#)

[HSE Advice on Social Distancing](#)

[Working safely during Coronavirus](#)

[HSE Working safely during Coronavirus](#)





# Coronavirus Response

## Consultation

Employers should consult with employees and trade unions about the return to the workplace. In the meantime staff should continue to work from home if they can.

Employers should keep up to date with the latest government guidance to help them plan ahead.

When planning to return to the workplace, employers must:

- consult with staff and employee representatives, including any trade union representatives and health and safety officials
- consider the risks of anyone being harmed in the workplace and carry out a suitable and sufficient risk assessment
- make the workplace as safe as possible for staff, customers and other visitors

Some employees may be anxious about their safety when returning to the workplace. Employers and employees should talk about any concerns and try to resolve them together. It can also help to signpost staff to any health and wellbeing support that is available, for example occupational health or mental health services.

## Cleaning – general guidance

- Think about your business and the layout of your premises. You should only consider cleaning surfaces yourself if you have the protective equipment and materials to hand, or these are readily available. We also understand that businesses may wish to use a service delivery option to do this work for them ahead of opening.
- Common and shared areas need to be managed, but it is important that you consult with other parties regarding cleaning and sanitising of these areas.
- Prepare a schedule of cleaning covering the following:
  - » Access and egress routes, what could anyone have touched?
  - » Always work from clean to dirty areas, to avoid spreading any contamination.
  - » Door handles, letterboxes, finger plates, keypads, glass surfaces and floors – these are just a few areas, but may well differ from premises to premises.
  - » Washrooms, WC's, and shower rooms should be subjected to a deep clean, especially if they are/have been available for public use.
  - » Phones, PC's, keyboards, desks and vending machines.
  - » Kitchen areas, taps, fridges.
  - » Wear protective gloves and thoroughly sanitise door handles, keypads and hard surfaces glass panels, mirrors etc that people may have touched.
  - » Although the Covid-19 virus cannot survive long on hard surfaces it is advised these should be cleaned/sanitised thoroughly.
  - » Use a proprietary sanitiser/wipes where possible to clean before you open to employees and/or the general public.
  - » Flush toilets, run taps and showers which have been unused for some weeks multiple times, to minimise the risk of legionella. Ensure shower heads are properly cleaned.
  - » Waste cleaning materials such as wipes, cloths, paper towels, gloves, masks etc need to be double-bagged and removed from site as soon as possible – they must not be allowed to build up. In some cases, they may have to be treated as low-level clinical waste and may require special pick up waste disposal services to be arranged.



# Coronavirus Response

## You must consider and manage the following:

- Update your risk assessments and working procedures in respect of the Covid-19 amendment.
- Confirm that your employees have had training refreshed in respect of Covid-19 for risk assessments and method statements.
- Confirm that you have, and can supply/provide, the correct PPE where this is required for work-related activities.
- Ensure that all employees are symptom-free and have not been in contact, within the last 14 days, with someone who has had, or is suspected to have had, Covid-19 or someone who has been required to self-isolate with suspected Covid-19.
- In addition, anyone who is classed as a vulnerable person, through age, ill health condition, pregnancy, or who is a carer for someone who is vulnerable, should remain away from work.
- Inform your insurer that you are operational and following specific guidance issued by HM Government and the HSE in respect of Covid-19.
- Confirm that all relevant insurance policies are still in force and the limits of indemnity remain as before the crisis.
- Review workplace transport safety and ensure this takes account of increased presence of cyclists as employees find alternative means of transportation to and from work.

## Document the following:

- **Assess:** review all areas of work activity, look for contact points between employees and others, possibly any members of the public, delivery drivers and consider / re-assess if these can be managed within the current social distancing guidelines. Update your risk assessments to reflect any changes.
- **Train and inform:** communicate with your employees about what the new changes may mean, ensure that employees fully understand, and above all document and record all training and information going forward.
- **Clean:** review welfare arrangements and facilities provided – can social distancing be achieved in washrooms and dry canteen facilities? You may need to stagger the use of these facilities and may need to supervise or control access and egress.
- All actions, systems and procedures must be documented – you may be required to produce evidence of compliance to a regulator.

## PPE

- **You must ensure that you have adequate supplies of PPE.** Some items of PPE are in very short supply, particularly FFP rated masks and certain types of gloves – employees must not be put at risk because there is no, or inappropriate, PPE to wear for specific workplace hazards. If the necessary PPE is not available, then the tasks should not be undertaken without it.
- As well as social distancing this will include the “effective management” of common areas such as washrooms and toilet facilities, welfare arrangements. Washroom facilities should not under any circumstance be degraded – hand washing remains a vital control measure in respect of Covid-19. Hot water, soap and paper towels must be available at all times.





# Coronavirus Response

## Two-person operations

- Consider which operations require two or more people and where Social Distancing may not be possible.
- Overhead crane operations (OTC) tends to be single operator or remote-controlled operations.
- Banksman slinging activities.
- Manual handling activities.
- Loading/offloading operations.

## Machine processes

- Some machine operations tend to be single operator type situations, but need to be reviewed to ensure there is no incidental contact: (NB list is not exhaustive, merely indicative)
  - » Press brakes, guillotines, are usually single operator stations.
  - » CNC machining, lathes and turning operations may be in banks of machines, therefore an assessment is needed to ensure operation of these processes meets the social distancing conformity.
  - » Spark erosion machining generally single operator.
  - » Vertical borers, radial arm drills again tend to be single operator.
  - » Circular saw – single operator.
  - » Band saw – single operator.
  - » Plastic extruding/moulding operations.
  - » Turret punches – single operator.
  - » Printing machines.

## Key personnel issues

- Think carefully about who you need to operate your business normally, this would include the following:
  - » Managers.
  - » First Aid trained personnel.
  - » HR/wage roll staff.
  - » IT support functions/CAD operators.
  - » Trained banksmen for lifting and traffic management.
  - » Trained forklift truck operators.
  - » Maintenance electricians/fitters.
  - » Supervisory staff.
  - » Fire wardens.
  - » **External service operatives - considerations**
    - Vending/coffee machine engineers.
    - Heating ventilations engineers.
    - Waste removal services.
    - Water treatment specialists (Legionella).
    - Office equipment technicians.
    - Fire & security engineers.

The list is not exhaustive, but merely to consider who may need to be contacted/ deployed post restrictions start up.





# Coronavirus Response

## Welfare

- As well as social distancing this will include the “effective management” of common areas such as changing area, shower facilities, locker rooms, washrooms and toilet facilities, welfare arrangements. Washroom facilities should not be under any circumstance be degraded – hand washing remains a vital control measure in respect of Covid-19.
- Provide hand sanitiser throughout the premises, particularly at entrances and exits.
- Display notices and posters reminding staff to wash their hands regularly.
- Staggering of washroom use and meal breaks may be required, as well as a regular and thorough cleaning and sanitising program.
- There will be additional rules and inductions and toolbox talks rolled out with respect to Covid-19 arrangements, and you need to ensure that your employees co-operate fully regarding these.
- There may be a need to provide changing rooms and access to shower facilities, as more employees find alternative means of getting to work, including cycling and walking longer distances.

## Shift work

- Introduction of temporary shifts and staggered shift arrangements may be necessary for the business to operate normally, and an assessment of shift impact work on the health and welfare of employees must be carried out.
- This will include areas like:
  - » Facilities cleaning/sanitising during and between different temporary shifts.
  - » Transportation to and from work - if it is necessary for you to provide transport to and from work by coach or minibus, social distancing must be observed. This may involve the use of more vehicles, or larger vehicles, in either case with fewer passengers.
  - » Additional car parking arrangements and secure cycle storage.
  - » External catering arrangements.

## Managing Covid-19 anxiety

- Without doubt many employees may feel anxious about travelling and returning to work considering the Covid-19 outbreak, and the issues associated with this will be around for some time to come. It is important that employers take due consideration of this, as this could impact the successful operation of your business.

The following link provides some guidance on anxiety around Covid-19 issues via the NHS.

<https://www.nhs.uk/oneyou/every-mind-matters/coronavirus-covid-19-anxiety-tips/>



# Coronavirus Response

## Restarting manufacturing following temporary shutdown

Opening a business premises, restarting processes and ramping up production at your facility where plant & machinery has been idle for a period of weeks during the Covid-19 lockdown can present challenges.

It is important the task is planned and performed by trained and competent personnel familiar with the facility, equipment and the relevant OEM guidelines. The objective is to resume operations in a controlled and safe manner whilst minimising the risk of further disruption to the business at this sensitive time.

The items and procedures that need to be considered will vary depending on the site layout, specific equipment and processes involved in your manufacturing facility, so should be assessed carefully in the planning stage. The following general considerations should be reviewed, and taken into account:

- Undertake a thorough inspection of the perimeter security including fences, gates, doors, windows, shutters etc to ensure they are undamaged and locking devices are serviceable.
- Inspect the building for any signs of damage or deterioration and arrange for remedial repairs as necessary.
- Fire alarm systems, access control, CCTV systems, intruder alarms, fire doors (including self-closers), fire extinguishers, fire dampers, emergency lighting/signage and emergency exits should be checked, and/or tested, to ensure they are fully operational and where required arrange for a service or emergency visit to rectify faults.
- Review the alarm keyholders to ensure adequate coverage is provided and ensure the intruder and fire alarm system alarm receiving centres are informed of any changes.
- Fixed automatic fire suppression systems should be checked to ensure they are serviceable and when in doubt arrange a service visit by the installer. Examples of systems include but are not limited to:
  - » Wet chemical systems to commercial cooking ranges.
  - » Gaseous fire suppression systems protecting critical plant & equipment.
  - » Water mist systems.Where automatic fire sprinklers systems are installed, please refer to the separate detailed guidance note.
- Reinstating building services where they had been shut down (heating, air conditioning, power and gas supplies etc) should follow the OEM procedures by suitably trained and competent staff, to ensure this is undertaken safely to minimise hazards and avoid damage or injury.
- Where the incoming water supplies have been isolated at the stopcock and systems drained, reinstating and refilling should be conducted in a slow controlled manner, checking for any leaks and to avoid water hammer which can cause damage to pipes, connections and fittings.
- Restarting manufacturing processes after a prolonged idle period may mean there are larger than normal quantities of raw materials and supplies delivered to site. This will need to be managed carefully, and the following considered:
  - » Do not block fire escape routes and exits.
  - » Items should be stored in designated areas and away from potential ignition sources such as boilers, electrical switchgear and battery charging etc.
  - » Storage heights should be carefully monitored to ensure they do not exceed the allowable for effective sprinkler operation.
  - » General housekeeping will need to be managed.

Waste storage and removal should be carefully managed as part of general housekeeping on site. Frequency of waste collections may be less than necessary, until normal services are fully resumed. Where additional arrangements are made to remove waste build-up, ensure you only use registered companies to avoid the potential risk of 'fly-tipping'. To check that a company is registered, go to the following website:

<https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers>



# Coronavirus Response

## Manufacturing process equipment start-up

All applicable health & safety legislation and regulations remain fully in force, including but not limited to:

- Provision and Use of Work Equipment Regulations 1998 (PUWER).
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER).
- Pressure Equipment (Testing) Regulations 2016.
- Electrical Equipment (Safety) Regulations 2016.

We recommend restarting of your process equipment is carefully planned and undertaken by suitably trained and experienced staff, in accordance with OEM guidelines as a minimum. The following general guidance should also be considered:

- As operational staff may have been away from work for some weeks, we suggest you provide refresher training in safe equipment operation and emergency procedures.
- Review and where necessary update previous fire risk assessments or other specific assessments such as DSEAR to ensure no procedural changes are necessary:  
<https://www.hse.gov.uk/fireandexplosion/dsear.htm>
- Check, and where possible test, the operation of condition monitoring devices (vibration, pressure, temperature etc.) plus safety shutdown interlocks.
- Ensure all specific fire suppression and detection installed to protect equipment is serviceable, including both automatic and manual actuation.
- Check the levels and condition of lubrication and hydraulic oils.
- Check and test correct running of local extract ventilation systems.
- Inspect pressure tanks and lines for damage or corrosion.
- Particular care should be taken when restarting fired process equipment, or those that use either flammable / combustible liquids or flammable gases, to ensure this is executed safely.
- Process equipment should be monitored and not be left unattended during the initial start-up.
- Where an unattended process previously notified and agreed with AXA is planned to be resumed, it should be run for a prolonged period with staff in attendance before being left unattended. This will ensure it is set up and running correctly to minimise the risk of a fault developing unnoticed causing damage or fire.
- Taking shortcuts when reinstating utility services or starting-up machinery that has been idle should be avoided, as this could lead to costly further disruption to the business.

