

Post-coronavirus start-up guidance: Construction sector - Subcontractors

This document provides some additional guidance to subcontractors starting back on site after the initial coronavirus shutdown.

These guidelines would 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
- Construction (Design & Management) Regulations 2015

All activities must only be undertaken in line with the current guidance issued by HM Government.

Social Distancing Guidelines
HSE coronavirus information
HSE advice on Social Distancing for Construction
Covid-19 testing for Construction workers



30th April 2020



Risk management measures

Where it is practical and permitted by Government advice in the current situation, the following best practice Risk Management measures should be observed:

Employee safety: First and foremost, employee safety is paramount, and activities must only be undertaken where social distancing guidelines can be applied practically. If this cannot be achieved work should not be resumed or should cease.

Activities: 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. This means looking at areas where your workers can successfully distance themselves from colleagues and work safely. Remember it may not be possible to carry out certain activities as you normally would - if they cannot be carried out safely, they must not be undertaken at all.

What should I expect to see from the Main Contractor?

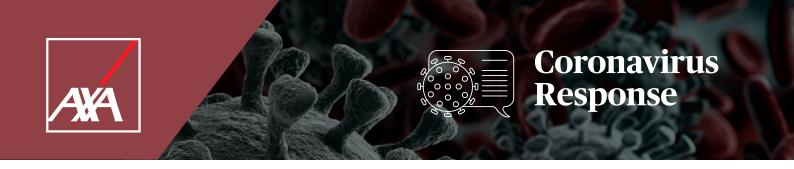
The Main Contractor has the principal responsibility for the management of Health and Safety on construction sites. This will now extend to include managing the phasing and safe return of sub-contractors under their control and ensuring that work activities can be carried out safely in accordance with the Covid-19 guidelines issued by Public Health England and HM Government.

You will, in all likelihood, be asked to have your operatives re-inducted to ensure that they understand new restrictions, site rules and arrangements for using welfare facilities and you could well be asked to operate out of hours and / or, introduce shift patterns in order to manage safely the social distancing elements of the Covid-19 guidelines.

The main contractor will likely require you to:

- Provide updated Risk Assessments and Method Statements 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
- Declare to the Main Contractor that all employees have not had Covid-19, been admitted to hospital have had to self-isolate or been in contact with someone that has
- Inform your insurer that you are operational and following specific guidance issued by the Main Contractor in respect of Covid-19
- Confirm that your Insurance Policy is still in force and the Limits of Indemnity remain as before the crisis
- You must be careful to ensure that any information you provide to the Main Contractor is correct
- Finishing trades may be able to work, so for example, painters and plasterers, electricians, plumbers, joiners etc could work alone, providing this does not put them at increased risk from lone working.

30th April 2020



Assess: review all areas of work activity, look for contact points between employees and other contractors possibly any members of the public 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 by the main contractor - can social distancing be achieved in wash rooms and dry canteen facilities?

Key checks to be undertaken

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.
- HSE updated guidance on fit testing face masks to avoid transmission during the coronavirus outbreak

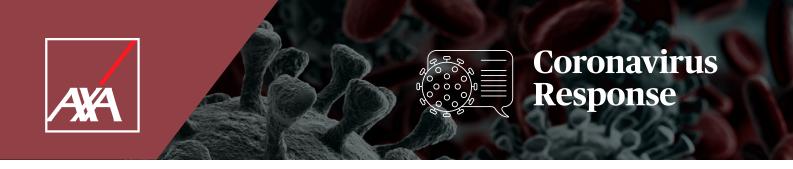
Main Contractor Responsibilities

- Main Contractors have the responsibility of maintaining site safety in accordance with the
 existing statutory requirements. With respect to the Covid-19 situation on sites the main
 contractor has the primary responsibility for ensuring that the Social Distancing
 Guidelines issued by HM Government are followed and managed daily.
- You should ensure that the health & safety arrangements in the construction phase plan, required by regulation 12 of the CDM Regulations, have been revised to take account of risks associated with Covid-19.
- As well as social distancing this will include the "effective management" of common areas such as washrooms & toilet facilities and welfare arrangements. Washroom facilities should not, under any circumstance, be degraded as hand washing remains a vital control measure in respect of Covid-19.
- There will be additional site rules, inductions and toolbox talks rolled out with respect to Covid-19 arrangements. You need to ensure that you cooperate fully with the Main Contractor regarding these.

Work Specific Areas

- Subcontractors should monitor the condition of washrooms, as these must be cleaned and maintained with adequate supplies of hot water, soap paper towels and hand sanitiser. Any deficiencies should be reported to the Main Contractor or Site Manager.
- Waste Paper towels need to be removed regularly and should not be allowed to build up and overflow from waste containers. Any deficiencies should likewise be reported.
- Access to dry canteens, breaks should be staggered, or breaks allowed in individual vehicles to maintain social distancing.
- Subcontractors should not be forced into situations to expedite programs and workload by the main contractor where they cannot observe social distancing measures and would thereby put employees at risk.

30th April 2020



- The HSE is the regulator for Public Health England regarding Covid-19 and can be contacted confidentially on 0300 003 1647
- Lone Working as the social distancing measures may increase the likelihood of lone
 working it is important that you update your risk assessment and increase the frequency of
 supervisory checks as part of your control measures.

Checking of Works

- Condition of the works, whether it be a building, structure, housing site etc must be subject to a formal inspection before the workforce can resume their working activities.
- Ensure that all temporary fire alarms systems are operational and resume routine fire alarm tests.

Scaffolding

• All scaffolding, ladders and access equipment must be inspected and certified safe for use before any employees can access it. Records of these inspections must be maintained.

Excavations

• Any open/shored excavations must be checked and inspected by a competent person to ensure that the condition of the works is safe, and that the excavation or works are stable and not likely to collapse. Records and reports of inspections should be kept, and you should not access any excavation unless this has been completed.

Plant and Equipment Checks

• Items of fixed heavy plant such as excavators, cranes, dumper trucks and other items must be put through the manufacturer start up checks. To do this it may be necessary to get the Plant Hirer or Manufacturer/Service engineer out to site to ensure equipment is safe to use and to avoid any damage to plant after a prolonged period of non-use.

Key Personnel Issues

- Consider what key personnel are required for the business to operate both safely and legally, clearly some key personnel could still be absent through ill health recovery etc and this could impact start up and recovery.
- Think carefully about who you need to operate your business normally, this would include the following:
 - » Site Managers
 - » Trained First Aid Trained Personnel
 - » Trained Banksmen for Lifting and Traffic Management
 - » Trained machine/plant operators
 - » Trained Fork Lift Truck Operators
 - » Maintenance Electricians
 - » Supervisory Staff
 - » Fire Wardens.

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

30th April 2020 4



The Construction Leadership Council Guidance

The Construction Leadership Council has issued Version 3 of Guidance relating to practical operations on construction sites during the Covid-19 crisis, which **the Main Contractor must take into account** and is responsible for implementing when re-starting and managing sites.

This document provides some good practical guidance on a range of issues. The latest version of this can be accessed **here**.

The following briefing has been prepared in collaboration between the industry's leading trade and representative bodies: Association for Consultancy & Engineering, Builders Merchant Federation, Build UK, Chartered Institute of Building, Civil Engineering Contractors Association, Construction Industry Council, Construction Plant-hire Association, Construction Products Association, Electrical Contractors' Association (ECA), Federation of Master Builders, National Federation of Builders, and Institution of Civil Engineers.

Guidance for workers video

Langley, supported by the Construction Industry Council, has produced a **short video** that demonstrates safe and responsible guidance for workers on construction sites operating during the Covid-19 pandemic, to ensure the protection of the workforce and minimise the risk of spread of infection.

This guidance advises how consistent measures on sites of all sizes can be responsibly and safely undertaken with adherence to the government's recommendations on social distancing.



30th April 2020 5