

North Lanarkshire Council

Report

Audit & Scrutiny Panel

approval noting

Ref FW/FD

Date 13/08/20

Risk Management Update – Corporate Risk L3 Health & Safety

From Fiona Whittaker, Head of People & Organisational Development

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Executive Summary

The Corporate Management Team has identified a number of key corporate risks which are subject to periodic review and scrutiny by Elected Members to ensure that the risks are properly understood and being adequately controlled. The purpose of this report is to provide a summary of the management of Corporate Risk L3: Health and Safety to the Audit and Scrutiny Panel, and in particular to detail how the effects of the coronavirus pandemic (Covid 19) have been managed against identified risks. The report highlights the current key controls which are regarded as being effective in mitigating this risk, as well as a number of planned actions which will be undertaken to either enhance current controls or to mitigate the risk further. More detail is provided in Appendix 1, which shows the risk matrix for this Corporate Risk which was recently reviewed to incorporate all relevant risks associated with the pandemic.

Recommendations

- (a) Audit & Scrutiny Panel are requested to note the contents of the reviewed risk matrix for Health Safety and Wellbeing aligned to the Covid 19 pandemic.
- (b) Elected Members are asked to note the very good progress made in the management of this risk during the course of the pandemic.

The Plan for North Lanarkshire

Priority Improve North Lanarkshire's resource base

Ambition statement (23) Build a workforce for the future capable of delivering on our priorities and shared ambition

1. Background

- 1.1 The COVID19 pandemic has brought about unprecedented circumstances requiring the Council to maintain full service provision for critical services, whilst also acting quickly to protect the safety & wellbeing of our employees, service users, school pupils and the wider community of North Lanarkshire.

- 1.2 Under the Health & Safety at Work etc Act 1974, the Council has a duty to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all its employees. This duty also extends to anyone who can be affected by the activities of the Council.
- 1.3 It should be noted that there is no exemption or relaxation from our duty of care under this legislation as a result of the pandemic. If anything, compliance with the relevant legislation has been and continues to be a critical priority, not only to ensure we protect our own workforce but that we play a wider part in stopping the onward transmission of the virus within the community around us.
- 1.4 As we move beyond the lockdown phase, the Scottish Government (SG) and Health Protection Scotland (HPS) have created a clear route map to transition Scotland into the next phase, with a gradual opening of activities and workplaces. This route map has been accompanied by a raft of specific guidance for individual work, education and community settings which has guided employers in implementing appropriate changes and controls.
- 1.5 The Council has fully adhered to this guidance at all times, but it should be noted guidance has been neither comprehensive nor exhaustive, and therefore significant work has also been undertaken locally and with services to develop relevant and practical local guidance and approaches to risk assessment and these have been made fully accessible to staff and managers.
- 1.6 The full involvement of the Trade Unions has also been a critical part of this process and we have ensured that they have been involved and consulted in both the risk assessment process and the development of local guidance. This has included for example specific activities such as “walk arounds” of school settings and other workplace environments to reassure Trade Unions and staff that all appropriate measures have been undertaken to protect their safety and wellbeing.

2. Report

- 2.1 The current residual risk rating is 9 MEDIUM, reflecting the wide range of guidance, management controls and ongoing arrangements which currently ensure that this risk continues to be effectively managed.
- 2.2 Outlined below are the most significant arrangements and controls which have already been put in place, or are ongoing to ensure that we are fully managing the COVID 19 Health and Safety Risks which have arisen in the course of the pandemic:
 - 2.2.1 Rapid provision of support for risk assessment creations and updates to ensure ongoing legal compliance – there is a wealth of experience within the team and this has been fully leveraged to provide a solutions based approach which has been well received. This has been demonstrated through a consistent support to services to ensure their risk assessments are suitable and sufficient.
 - 2.2.2 We have fully utilised our existing digital solutions and platforms to ensure that we are engaging staff and managers in what they need to do to prepare and adapt their workplace. An example, which has been very well received, are the comprehensive safety & wellbeing briefing webex calls for Senior Education Staff and Head Teachers who have attended in cluster groups with a Q & A session included.

- 2.2.3 We have also undertaken a wider and ongoing campaign of regular communication to managers and employees – managers have had clear safety and wellbeing guidance to hand at all stages of the pandemic, and employees have been kept up to date on how the Council has been transitioning out of lockdown and the measures needed to be in place to protect their safety.
- 2.2.4 We have fully liaised with other local authorities to share best practice through the SPDS group. In discussion, it is evident North Lanarkshire has addressed the challenges the pandemic presented more quickly and efficiently than some Local Authorities with employee safety remaining a clear priority.
- 2.2.5 Digital platforms such as My NL have been leveraged to enable easy access to documents and guidance from a range of devices, including a raft of generic risk assessments for manager's use and to also permit employee and trade union access. Documents also created and made available include tool box talks for managers for employees returning to work, weekly checklists to ensure the measures implemented were suitable and sufficient and other Covid 19 related assistance.
- 2.2.6 More comprehensive PPE guidance documents have been created including specific documents for relevant sections. This includes the recently agreed PPE Interim Policy Document, (Appendix 2) which pulls together a live document which details all of the PPE requirements in place across the Council including for members of the public accessing Council buildings.
- 2.2.7 The safety & wellbeing team have been highly effective during the pandemic, and are fully equipped to work remotely – this has resulted in a fast response to the requirements of the organisation whilst maintaining the SG default position of working from home.
- 2.2.8 Our positive working relationship with the Trade Unions has been material to our ability to maintain a stable employee relations over the course of the pandemic with ongoing Trade Union input and buy in to changes in processes and procedures at a fast moving pace.
- 2.2.9 As we anticipate more permanent change to the workplace, including increased levels of homeworking across our employee base, the team have also been heavily involved in enabling self-assessments for home workers with 3144 self assessments completed to date. This will ensure that we achieve legal compliance for the Council for all staff who are likely to be in this position for the foreseeable with managers reviewing the assessments to identify any concerns/issues, allowing for further action to be taken as required.
- 2.3 Further work is now underway with the management planned actions detailed in the risk document in Appendix 1. Training for the safety team to utilise digital options in place of face to face presentation has commenced as has work looking at the training offered and how we will progress. Work to permit face to face health surveillance has been completed with mitigating measures in place to protect employees and a programme of appointments for September 2020 is being implemented.

- 2.4 The Covid 19 pandemic is far from over, and as such the risks will continue to be monitored, we are however fully confident that the steps and measures we have undertaken as outlined above will continue to provide us with a solid platform for the management and control of ongoing Health and Safety Risks and within this the Council will continue to fully comply with its duty of care under the Health and Safety at Work Act and all SG/HPS guidance as it is issued.
- 2.5 Finally the Health & Safety team are also continuing to manage wider Health, Safety and Wellbeing matters across the Council and recent improvements have been made in key areas including our the management of our approach to Hand Arm Vibration issues which had been highlighted as an area for improvement by the Health & Safety Executive.

3. Equality and Diversity

- 3.1 Fairer Scotland Duty N/A
- 3.2 Equality Impact Assessment N/A

4. Implications

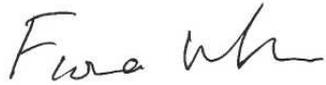
- 4.1 Financial Impact – Poor management of Health & Safety could result in significant financial impacts from managing our services throughout the pandemic, including fines and fees for intervention by the Health & Safety Executive.
- 4.2 HR/Policy/Legislative Impact – There are significant ongoing risks associated with poor management of our Health, Safety and Wellbeing practices and policies during the pandemic, and these include potential industrial action, prosecution and legal claims as a result of our failure to manage the associated risk for both our employees and the residents and communities we serve.
- 4.3 Environmental Impact – None identified.
- 4.4 Risk Impact – There is ongoing monitoring and review of the risks identified by senior management and any required further controls will be implemented in line with Scottish Government and Health Protection Scotland guidance.

5. Measures of success

- 5.1 Ensuring that the Council fully and robustly manages the risks from Covid 19, to both our staff and our communities, and continues to respond effectively to the challenges it brings until we progress to a point where the risks are reduced to as low as reasonably practicable.

6. Supporting documents

- 6.1 Appendix 1 - Health & safety risk review as at July 2020.
- 6.2 Appendix 2 – Interim PPE Policy



Fiona Whittaker
Head of People and Organisational Development

Appendix 1

<p>CORPORATE RISK REVIEW Covid 19 - HEALTH & SAFETY</p>	<p>CORPORATE RISK LEAD: Fiona Whittaker (Head of Business Organisation & People Solutions)</p>	<p>CORPORATE WORKING GROUP:</p>
<p>Risk Context</p> <p>On 31 December 2019, the WHO China Country Office was informed of cases of pneumonia unknown etiology (unknown cause) detected in Wuhan City, Hubei Province of China. From 31 December 2019 the virus has spread rapidly, reaching the UK with its first case on 31st January 2020. The first Scottish case was confirmed on 2 March 2020. Since then the virus has spread globally at pace.</p> <p>NLC needs to plan and respond to the global pandemic with consideration on a number of fronts including the Health, Safety & Wellbeing of employees and those that might be affected by its activities, including service users. The response takes into account the potential for significant level of staff absence – with a working assumption of c35% staff reduction at any one time for a prolonged period. There is also considering of increasing impacts on the health and well-being of the wider community with a particular emphasis on the elderly and those already identified as ‘vulnerable’.</p> <p>The Council has important health and safety obligations in respect of both employees and contractors and in respect of service users and the wider community. These legal obligations and responsibilities remain but are significantly impacted by COVID-19 which creates additional issues and challenges in respect of the safety and well-being of staff and those with whom our staff come into contact.</p> <p>COVID-19 creates additional H&S challenges for NLC. The council has a primary role to protect the HS&W of staff to limit the transmission of the virus, and if not managed well, there is an increased risk of transmission to others including residents of North Lanarkshire, in particular those considered vulnerable. This is particularly significant in relation to those employed in care/support roles in close physical contact with service users. Any shortages of appropriate PPE would make this a significant challenge.</p> <p>Many mitigating actions come directly from following Government guidance, including reduction of services to those deemed not vulnerable where Services that cannot be done from home, and a significant shift to home working for other staff who can work from home. Reduced numbers of staff and prioritisation of critical services means that some services which can have an impact on health are not being undertaken to normal levels.</p> <p>NLC is a major employer in North Lanarkshire, with many staff also living in the area. How well it manages the situation for staff and service users could therefore have a significant bearing on the overall rate of transmission across the council area.</p>		<p>Last Review Date: July 2020 Next Review Date:</p> <hr/> <p>Governance & Oversight:</p>

Appendix 1

<p>Risk Description The Council is unable to maintain its existing arrangements and controls to ensure compliance with the Health & Safety at Work etc. Act 1974, and associated legislation protecting the health, safety & welfare (including mental health) of its employees and anyone else who can be affected by its activities, and or fails to develop and implement enhanced and appropriate controls for the additional health & safety risks arising from the Covid-19 pandemic.</p> <p>Due To Clarity and timing of Government advice; failure to interpret and implement Government directives; Non adherence to council instructions and guidelines; Increased demand for support from the Health and Safety team over a prolonged period (up to 6 months) during the recovery period. Deliberate circumvention or disregard of the emergency regulations and instructions by staff; non-compliant behaviours by service users threatening our ability to maintain safe working arrangements for staff; Inadequate or poorly timed critical decision making; non availability of workforce (including employees, agency staff, contractors etc. particularly in the most critical service areas, and those support functions which enable continuity of front line services and home working; Ineffective communications with staff, service users and public; shortages of essential materials/PPE e.g. masks, sanitizers etc.</p> <p>Impacts Increased levels of harm, injury, serious illness and death among workers and service users; Impacts on the mental health & wellbeing of employees, both where staff are exposed to stressful working conditions potentially for prolonged periods, as well as the more general impacts of dealing with what is a stressful, unusual and uncertain time with personal and social restrictions and isolation; risk of not providing services consistent with relevant legislation and guidance; Inability to deliver critical frontline services upon which the public relies; Diminished public confidence in the council/ significant reputational damage; Increased pressure on emergency services and hospitals;</p>	<p>Organisational Risk Heat Map - Covid Specific</p>
	<p>Primary Social Care (Home Support) All staff Staff employed by Social Care for Home Support</p>
	<p>Secondary</p>
	<p>Third All other areas</p>
<p>Council Priorities most impacted by the risk: Improving the Council’s resource base</p>	

Appendix 1

Inherent Risk Rating	Likelihood - 4 Impact -3	Inherent Risk Rating – 12 MEDIUM
Rationale for Inherent Risk Rating	This is the residual risk rating taken from Risk RIS 0000004 H&S confirmed with the Risk Lead as still being in place.	
Covid-19 Inherent Risk Rating	Likelihood - 5 Impact -5	Inherent Risk Rating – 25 HIGH
Rationale for Covid Inherent rating	The existing pre-Covid H&S risk controls will not be enough to deal/cope with the additional risks and impacts brought about by the Pandemic. Without an appropriate and effective response to manage the additional risk, the spread of the virus will affect staff and service users, causing disruption to the continuity of critical services and contributing to virus spread. Without an effective response, impacts are likely to be catastrophic given that many of the Council services cannot operate effectively over a prolonged period with the projected level of staff absences and increased demands and that many Services are essential to sustaining the health and well-being of service users. In addition many Council staff are themselves likely to be in the higher risk groups. Ultimately impacts could be significant harm including death of staff and service users.	

CURRENT KEY CONTROLS IMPLEMENTED TO ADDRESS ADDITIONAL COVID-19 RISKS	CONTROL OWNER
<p>1. Health & Safety team are fully mobile and able to work remotely during this period to deliver service and meet increased demand over next 6 months including:</p> <ul style="list-style-type: none"> • The team ensuring they are up to date with Scottish Government and Health Protection Scotland guidance to achieve compliance. • The safety SPDS group adapting their meeting style to include fortnightly webex calls to ensure best practice and industry knowledge can be shared during the pandemic situation. • The team supporting services to update RA's to covid specific current controls 	Fiona Whittaker, Head of People & Organisational Development
<p>2. Timely consideration, distribution and implementation of NHS and Government information and advice including:</p> <ul style="list-style-type: none"> • Guidance to staff on how to protect themselves and others i.e. posters on hygiene procedures etc. • Implementation and Guidance on social distancing i.e. working from home where feasible, avoiding unnecessary meetings; unnecessary travel etc. • In line with Government advice, staff required to 'Shield' sent home for a period of 12 weeks • Timely closure of facilities such as leisure centres, gyms, theatres, etc. in line with advice on large gatherings 	S Penman, Head Strategic Communications
<p>3. Reduction or cessation of some services and closure of premises reduces the scale to manage and allows focus of controls on a reduced number of locations and staff numbers. In order to meet the Councils insurer's requirements fire risk assessments will continue within buildings that are closed.</p>	F Whittaker, Head of People & Organisational Development
<p>4. Dedicated ESC and Covid-19 email address to report and capture event related absences.</p>	F Whittaker, Head of People & Organisational Development

Appendix 1

7.	Regular guidance to managers for staff on the importance of maintaining social distancing and safe working arrangements for those unable to work from home, and guidance on working from home.	F Whittaker, Head of People & Organisational Development
8.	Communications/guidance for staff 'Looking after your Health, Wellbeing and Personal Welfare'	Fiona Whittaker, Head of People & Organisational Development
9.	Increased access to psychologists through Occupational Health Provider for staff who require support with mental health & wellbeing.	Fiona Whittaker, Head of People & Organisational Development
10.	Engagement in national procurement initiative to secure PPE and the associate budget provision for required PPE are managed through the Council's recovery group utilising a central ordering and distribution point to ensure control of this element.	Robert Steenson, Executive Director, Enterprise & Communities
11.	Union consultation with GMB, Unison and Unite, EIS and NASUWT is via a weekly phone conference as well as ongoing local consultation on covid matters.	Fiona Whittaker, Head of People & Organisational Development
12.	Use of Yammer and other digital communication tools to maintain connectedness and reduce isolation.	Fiona Whittaker, Head of People & Organisational Development
5.	Risk assessments for staff providing services to the public and the Council are undertaken as well as specific workplace risk assessments where appropriate for staff working in premises that remain open. Contractors to the Council are required to provide evidence as to how they are managing the risks of Covid in relation to the work they undertake for the Council.	F Whittaker, Head of People & Organisational Development
6.	Reprioritising of cleaning regimes across Council premises including the provision of hand sanitiser at entrances etc.	A Hanlon, Facility Support Services Manager
Residual Risk Rating	Likelihood - 4 Impact - 5	Residual Risk Rating – 20 High
Rationale for Residual Risk Rating	The current controls are working well with an extremely effective response from the Council. The Council has adhered to Scottish Government and Health Protection Scotland guidance throughout and this has stood us in good stead. Employees are being supported in a number of different ways including campaigns for mental health. Consultation with the trade unions has been ongoing throughout the pandemic and regarded as highly beneficial by both management and unions. Personal protective equipment has been very well managed with a central order and distribution point created and with no significant issues in the procurement of the products required. Liaison with SPDS has illustrated that North Lanarkshire Council has in fact progressed work to manage the Covid 19 situation at a rapid pace, providing necessary support, updating risk assessments and where required ways of working. Communication from the Chief Executive down to a local level has been vital in keeping employees up to date and included in how the Council moves through this difficult time.	
Management Planned Actions:		Responsible Person
1. Providing appropriate assurance to both the Trade Unions and the Health & Safety Executive that all Health and Safety matters related to COVID are in hand and being well managed.		Fiona Whittaker
2. Management of ongoing risk assessments and social distancing requirements in response to change and recovery plans		Fiona Duddy
3. Management of continued and ongoing PPE requirements		Robert Steenson
4. Renewal of safety training provision to utilise digital platforms		Fiona Duddy
		Timescale
		Ongoing
		Ongoing
		Ongoing
		Sept 2020

Appendix 1

5. Liaison with other LA's through SPDS for industry knowledge current controls	Fiona Duddy	Ongoing
6. Roll out of online home worker self assessment	Fiona Duddy	Complete July 2020
7. Roll out of online DSE self assessment	Fiona Duddy	Complete July 2020
8. Renewal of elements of the safety team remit to remove the requirement for face to face utilising digital options eg topic visits	Fiona Duddy	Sept 2020
9. Health Surveillance to return to face to face appointments with appropriate control measures in place to permit this	Fiona Duddy	Sept 2020

Please note this is a live document and subject to change to ensure compliance with Scottish Government and Health Protection Scotland Guidance.

COVID 19 – PPE Interim Policy Framework for Services

Author	<i>Fiona Duddy</i>	Contact details	<i>duddyf@northlan.gov.uk</i>
Owner	<i>Gold Command</i>		

Date	<i>09/07/20</i>	Version number	<i>1.3</i>	Document status	<i>Complete</i>
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Governance Committee	<i>Gold Command</i>	Date approved	
Review date	<i>As required</i>		

Strategic Alignment
<i>Health & Safety at Work etc Act 1974</i>

Consultation process	<i>Gold Command Trade Unions</i>	
Stakeholders		
	<i>All council services</i>	
Distribution	<i>All council services</i>	

Change record

Date	<i>16.07.2020</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the Council will adopt the exemption within the Scottish Government guidance in removing the requirement for members of the public to wear face coverings when accessing money services, namely our municipal banks. The document reflects we will also comply with the areas within the exemptions list considered 'reasonable excuses' not to wear a face covering.</i></p> <p><i>Further update to reflect the Scottish Government guidance specific to the return of Schools.</i></p>		
Date	<i>03.08.2020</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect Education specific guidance issued 30/7/20 detailing face coverings required for adults only where 2m social distancing cannot be achieved and there is close contact for 15 minutes or more. Further updated to reflect requirement for fluid resistant surgical masks required where intimate care is given to a pupil displaying covid symptoms or where there is a risk from a pupil of spitting, coughing or vomiting and in this scenario protective eye wear is also required.</i></p>		

Background

The COVID19 pandemic has brought about unprecedented circumstances requiring the Council to maintain full service provision for critical services, whilst also acting quickly to protect the safety & wellbeing of our employees, service users, school pupils and the wider community of North Lanarkshire.

The Council has a clear duty of care under the Health & Safety at Work etc Act 1974 to provide a safe workplace for employees. Any cases of COVID 19 which are proven to have been contracted in the workplace are reportable under the RIDDOR regulations 2013 to the Health & Safety Executive.

During the course of the lockdown period, the Council has maintained the default position, guided by the Scottish Government, of 2 metres social distancing and homeworking wherever possible. Where neither of these measures are possible, the use of personal protective equipment (PPE) has been vital in ensuring the safety and wellbeing of our employees. PPE refers to a number of products such as eye protection, gloves, aprons, safety boots, visors, face masks etc. and many critical services within the Council have been required to adopt a variety of types as additional control measures over and above social distancing.

Given the wide scope and variety of services the Council delivers, it has also been necessary for us to undertake ongoing and detailed local risk assessments to identify additional or indeed enhanced measures, including PPE, to ensure that we manage our activities safely. All of this has been underpinned by a shifting landscape of specific guidance from the Scottish Government and Health Protection Scotland, which often requires us to rapidly interpret and adopt any guidance to ensure full ongoing compliance with our responsibilities.

As we proceed out of the lockdown phase and into recovery, and with more Council services opening concurrently with other sectors, including Leisure and Retail, it is clear that PPE will play an ever increasing role as a mitigating control measure which will be adopted to prevent the spread of COVID 19, particularly in settings where social distancing will be difficult to maintain or control effectively.

In light of this, and the growing breadth of guidance now available and still emerging for different settings, we have pulled together this comprehensive interim policy document which sets out all of the current PPE guidance aligned to the different settings we now have across the Council.

This is designed to ensure that services have a clear ongoing view of what PPE is currently required for their particular setting. It is also designed to ensure that as we recover and operate services during this period, there is a clear flow through from guidance in place or issued, to the assessment of required PPE following localised risk assessments and the regular ordering of PPE through agreed channels to ensure that it is fully available at the required level and standard.

Current Position for PPE

It is important to emphasise that in line with relevant legislation, the Council regards PPE as a secondary control measure with the primary focus being on the management of identified risks through elimination, reduction, preventing contact and safe systems of work. This process has been followed when reviewing the existing risk assessments during the pandemic, in addition to identifying those activities where PPE has been the correct control measure to implement.

Services who currently use PPE as part of their risk control have all been subject to a detailed review of their status in line with up to date guidance from the Scottish Government (SG) and Health Protection Scotland (HPS). Relevant detailed PPE guides have been created advising employees what is required for their role, as well as other information such as how and when PPE should be removed and replaced. A full list of these guides has been made available on My NL along with completed current risk assessments.

Updated Scottish Government Guidance

On July 2nd, updated information was issued by the Scottish Government indicating that in order to continue to slow the spread of COVID-19, 2 metre social distancing would be augmented with specific guidance and controls in some areas where the 2 metres could not be maintained or guaranteed such as in shops or on public transport.

<https://www.gov.scot/publications/covid-19-advisory-group-physical-distancing-advice/>

One such control, which has now been made mandatory from Friday 10th July was for the general public to wear a **face covering** in retail settings where social distancing is difficult to control.

A decision made by Gold on Friday 3rd July, in line with the guidance update was that all members of the public entering any NLC establishment will from Friday 10th July be required to wear a **face covering**. Within the Scottish Government guidance there is an exception for money services and the Council intends to apply this exception to our municipal banks. The Council will also comply with the other areas within the exemptions considered as 'reasonable excuses' these can be viewed via the link below.

<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-staying-safe-and-protecting-others/pages/face-coverings/>

Within the School estate visitors will be discouraged but where this cannot be avoided they will be required to wear face coverings. This includes parents, contractors, Council employees and anyone who does not normally work within the School.

The default position for the Council remains that 2 metre social distancing will be adhered to within our organisation so far as is reasonably practicable. This will also continue to be supplemented with hand and respiratory hygiene. In line with the change in guidance we will now look at our risk assessments to identify measures which could apply where 2 metre social distancing is unlikely to be achieved or maintained. This includes reviewing settings where tasks could be undertaken using the SG suggested mitigating measures of optimising ventilation, using a mask or face covering, surface cleaning and utilising solid barriers such as perspex screens. This will be kept under review as guidance evolves and changes.

Face Masks vs Face Coverings

Health Protection Scotland has issued guidance as follows to ensure there is an understanding on the difference between masks and coverings. This is shown below:

It is important to note the difference between face masks and face coverings. Where HPS guidance refers to face masks this means surgical or other medical grade masks that are used in certain health and social care situations. Face coverings are made from cloth or other textiles that cover the mouth and nose, and through which you can breathe (e.g. a scarf).

The use of face masks is not currently recommended for the general population. There is no evidence of benefit to support the use of face masks outside healthcare environments. Face

masks may be advised for those diagnosed with or suspected to have COVID-19 to reduce spread of infection in specific situations.

Physical (social) distancing, shielding, following stay at home advice, and good hand and respiratory hygiene practices are the key measures for preventing spread of COVID-1.

It is important that the Council recognises the difference detailed above to ensure we do not deplete PPE stock of masks required to protect those in critical services such as homecare when in fact it is face coverings that are required. This will be clearly set out in detailed PPE guides for services and settings.

Transitioning Through Recovery

The Scottish Government has put in place a clearly phased route map for recovery and as we move through each of the phases there will be an associated relaxation of the measures currently in place. As this progresses we will inevitably see further pressure on services in regards to their ability to maintain primary control measures such as rigorous 2 metre social distancing and home working. The associated and proper use of mitigating measures including PPE will therefore become critical to balance the effect of this, and ensure that we continue to mitigate all-risks of the further spread of COVID 19.

To ensure that services have fully up to date guidance on the use of PPE, a robust process for ongoing risk assessment and the ordering of relevant stocks of the right PPE for their particular setting, we have produced this interim policy framework which is designed to be used a part of overall recovery planning efforts.

The Scottish Government are clear that where the 2m distance is reduced further mitigating measures must be implemented and further guidance is awaited on this approach relating to specific sectors. The Council must be prepared to react quickly to any such change in order that it does not inhibit us from progressing with our service recovery work, by demonstrating a clear approach to risk assessment and PPE and outlining how any change in guidance would be adopted.

To support this, we have set out below in Table 1 the four discrete settings we currently have within the Council along with the associated full current PPE guidance relating to these settings. Also included is the most recent change relating to the use of face coverings/face masks.

Table 1

Setting	Existing PPE Guidance	Recent Changes (2nd July)
<p>Close Contact Environment:</p> <p>For example</p> <ul style="list-style-type: none"> • Health & Social care • FSS - Catering • Cemeteries 	<p>Specific guidance for health and social care settings (Homecare) can be found https://mynl.co.uk/knowledge-base/covid-19-safe-ppe/</p> <p>The relevant HPS Scotland can be found https://www.hps.scot.nhs.uk/web-resources-container/covid-19-information-and-guidance-for-social-community-and-residential-care-settings/</p>	<p>In line with risk assessment for the activity being carried out, appropriate mitigating measures must be implemented. This may include the use of face coverings or masks where social distancing cannot be maintained or controlled. Risk Assessments require to be reviewed to determine</p>

	<p>For non-health & social care settings, where there is a risk that staff are unable to socially distance from others additional mitigating measures should be considered. This should be ascertained following a full local risk assessment process.</p> <p>The relevant HPS Scotland guidance for non-healthcare settings can be found here https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/</p> <p>The full list of detailed PPE Guidance which has been created for relevant settings can be accessed here https://mynl.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>All guidance documents have been written for the services where PPE is currently in use and are subject to change in line with guidance. If your service requires to create specific guidance following recovery or a change in government guidance covered here please email the Health & Safety team immediately at healthandsafety@northlan.gov.uk</p>	<p>the correct item of PPE required and the usage.</p>
<p>Education & Childcare</p> <p>Education Staff</p>	<p>The most up to date position for Schools opening on 11th August has confirmed that that there will be no social distancing required for Pupils.</p> <p>https://www.gov.scot/news/planning-for-re-opening-schools-safely/</p> <p>Staff should continue to maintain 2 metre social distancing wherever possible.</p>	<p>Within Primary and Secondary School settings face coverings will not be required for staff in school, with the exception of where 2m social distancing cannot be achieved between adults and anyone else where close contact will occur for 15 minutes or longer.</p> <p>Scottish Government guidance at 30/7 states that face coverings will not be required in the school environment but that anyone who wishes to wear one should do so or who has been medically advised to do so.</p> <p>Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with</p>

ASNA – for complex needs	<p>Specific PPE guidance for employees working in ASN Schools can be accessed https://my.nl.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>Individual risk assessments for ASN pupils have been reviewed to reflect the Covid situation.</p>	<p>symptoms of COVID-19 and needs direct personal care.</p> <p>Fluid-resistant surgical masks and eye protection should be worn if a risk assessment determines that there is a risk of splashing to the eyes such as from coughing, spitting, or vomiting.</p> <p>Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with symptoms of COVID-19 and needs direct personal care.</p>
Early Learning and Childcare Settings	<p>Guidance for phase 3 re-opening of childcare settings can be accessed here https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-on-reopening-early-learning-and-childcare-services/</p> <p>https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-reopening-school-age-childcare-services/</p>	<p>Within Early Years Settings face coverings will not be required for staff, with the exception of where 2m social distancing cannot be achieved between adults and close contact will occur for 15 minutes or longer.</p> <p>Individual risk assessments for pupils requiring close contact assistance to be carried out to determine the need for any additional PPE in the current situation.</p> <p>Fluid-resistant surgical masks and eye protection should be worn if a risk assessment determines that there is a risk of splashing to the eyes such as from coughing, spitting, or vomiting.</p>

		Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with symptoms of COVID-19 and needs direct personal care.
Depots, offices or other operational locations: Waste	<p>No specific guidance on the specific use of PPE in these settings has yet been published and social distancing, hand hygiene, respiratory hygiene and cleaning are the primary control measures which should be applied.</p> <p>The full list of existing detailed PPE Guidance which has been created for other settings which may include depots can be accessed here https://my.nl.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>Guidance for the waste sector has been issued and can be accessed here https://www.gov.scot/publications/coronavirus-covid-19-waste-sector-guidance/</p>	Where 2 metre social distancing cannot be maintained or controlled, additional mitigating measures should be considered and following a detailed risk assessment, the appropriate control measure will be implemented. This may include the use of face coverings/masks.

<p>Transport:</p> <p>For example</p> <p>Work vehicles</p> <p>School Transport – mainstream</p> <p>School Transport - ASN</p>	<p>Other than on public transport, specific guidance on the use of PPE in transport has not been published and social distancing, handwashing and cleaning are the primary control measures which should be applied.</p> <p>The SG is currently looking at other sectors where continued enforcement of 2m social distancing would adversely impact on the ongoing provision of services following recovery.</p> <p>Further guidance on additional measures to be implemented are awaited.</p>	<p>Risk Assessments required to be reviewed in line with the updated guidance and activity and movements should be taken into account.</p> <p>For all staff using public transport for service delivery (for example homecare workers) a face covering to be worn in line with Scottish Government guidance</p> <p>Scottish Government guidance 16/7 states there will be no social distancing or face coverings required for School pupils on dedicated School transport.</p>
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Next Steps

Through recovery group, and working in partnership with Health & Safety, Heads of Service will be asked to review the position with all of their services following the updated guidance, including the requirement to assist any member of the public who arrives at a Council building without one (with the exception of municipal banks where face coverings are not required and in compliance with the list of 'reasonable excuses' detailed by the Scottish Government).

They will also be asked to consider activities currently undertaken which, if there is further changes to social distancing, may mean work activities can be undertaken with additional control measures. The framework outlined in this interim policy will be kept under constant review and will be updated as new guidance emerges. This will prompt the requirement for further ongoing risk assessment review and the ordering of PPE where required.

All guidance to date has been shared with Trade Unions, who have also been given full access to completed risk assessments. This interim PPE policy framework will also be shared with Trade Unions for their review and input and they will be given full access to it on an ongoing basis. Following further SG/HPS guidance updates this document will also be fully reviewed and reissued to reflect all changes and where necessary a review of all associated risk assessments will be undertaken.

Ordering of PPE

There is already an effective process in place for the periodical capture and ordering of required PPE stocks, through the joint equipment store and this is currently used successfully. This process will be adapted and more broadly deployed, with checks through recovery group to ensure that Heads of Service are reviewing and ordering appropriate stocks of PPE as guidance and risks assessments change.

Where large volumes are anticipated, following an update to SG or HPS guidance the procurement team will assist with the additional purchase of PPE stocks to ensure that this does not impact on recovery or service delivery.

Recommendations

- The Council continues to adhere to Scottish Government and Health Protection Scotland guidance
- The Council continues to maintain social distancing as the default position but with increasing consideration of the adoption of PPE and other controls to align with the recovery process.
- Upon receipt of further SG guidance reducing the requirements for the 2 metre distancing appropriate work will be undertaken to implement suitable and sufficient controls
- Communication is issued to the public regarding the requirement for face coverings when they visit Council buildings with the exception of municipal banks where an exemption applies
- Heads of Service to start planning where activities could be managed in the event of reduced social distancing requirements and use of face coverings and likely quantities.

Further information

Scottish Government
Health Protection Scotland
Health and Safety Executive

<https://www.gov.scot/coronavirus-covid-19/>
<https://www.hps.scot.nhs.uk/>
<https://www.hse.gov.uk/>