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With thanks to:
Pentagon Plastics
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TCL Packaging
The following guidance reflects good manufacturing practice only, which is based on and remains subject to changes from time to time to the UK government’s response to COVID-19 and guidance published by Public Health England. It takes the advice from Public Health England and practical experience from BPF members to identify practical ways in which mitigations may be employed in order to keep our employees safe whilst continuing production. It should be used in a manner appropriate for the nature and scale of each business.

Hygiene/Sanitation

Production sites are working hard to fit sanitising stations throughout their facilities and providing cleaning products for regular workstation cleansing. But you must ensure you have cleaning and sanitising chemicals which are certified as effective against enveloped viruses. EN 14476 is the standard for Chemical disinfectants and antiseptics effective against viruses. If your chemical does not have this certification, ask for validation for effectiveness against viruses.

Ensure personnel are trained to wash their hands for the required 20 seconds with soap and water; this is more effective than relying on sanitiser alone. Hand washing cannot happen often enough; this should be carried out by all staff after being in a public place, blowing their nose, coughing, and/or sneezing. Identify key touch points (control panels, door handles, keypads, vending machines, etc) and ensure these are being cleaned and sanitised at an agreed frequency – minimum every 2 hours.

Identify ‘common areas’ where there might be a high level of cross over, for example canteen areas; these areas should be cleaned with a viricidal cleaner between different groups of personnel.

Handling deliveries, post and packaging should be carried out according to existing risk assessments.

If a large percentage of your staff travel on public transport, consider implementing work clothes where staff change into clothes on arrival at your facility that they only wear at the facility and can then change into travel clothes when they are ready to leave – particularly shoes.

Assign a manager as your coronavirus ‘champion’ to make sure that employees are following procedures.
Social Distancing

Social distancing measures are steps you can take to reduce social interaction between people. This will help reduce the transmission of coronavirus (COVID-19). Some of the strategies adopted by the UK plastics industry include:

- Asking staff to communicate via email or telephone where possible
- Reduced internal meetings, or better still, carried out via video conferencing
- No desk sharing
- All business travel prohibited
- Time gaps between shifts so production teams have no opportunity to meet
- Staggered break times
- Employees must only handle their own food stuff
- There must be no communal food (biscuits, cakes, etc.) brought onto site
- Production lines rearranged to keep staff 2 metres apart
- Diverting plant walkways to outdoor routes
- One-way walkways
- Wherever possible, admin staff should work from home

Changeover Times and Staff Interaction

Reducing staff interaction reduces the chances of the virus spreading between your staff members and lowers the possible impact on your business:

- Stagger changeover times between shifts as much as possible, so there is less intermingling.
- Keep your shifts a mix of the same people and try to prevent people swapping shifts. This will mean that a staff member who catches the virus is less likely to spread it across multiple teams in your business.
- Encourage staff to keep their distance from one another when working and introduce something like a two-metre rule if feasible.
- Discourage staff from entering parts of your site unless essential to their role.
- Ban handshaking in the office.
- Rotate lunch and break times to avoid large gatherings.
- Encourage staff to bring their own food and minimise use of communal kitchens.
- Where there are no practical alternatives workplace canteens can remain open to provide food for their staff and/or provide a space for breaks, the government has confirmed in further guidance. Measures should be
taken to minimise the number of people in the canteen at any one given time, for example by using a rota.

If you are limiting production, then it could be possible to do one of two things:

1. Where possible, assign different shifts different machines to lower the opportunity for coronavirus to be transmitted via surfaces.

2. If reduced capacity will mean shutting down some machines entirely then you can ramp up your cleaning regime on the machines you will be using.

What about visitors to my site?

Communication with your customers and suppliers is key. There should be no real need for external visitors to come to your place of business for a meeting. Digital meeting platforms are in common use in business and now, more than ever, provide an essential tool for collaboration, not only with your supply chain but for internal team meetings.

Drivers for collection & delivery should be forbidden to enter any building for any reason at any time. A sign off procedure should be in place (and forewarned to all drivers) for all deliveries/collections that ensures 2m social distancing and sanitation guidance.

Working from Home

WFH can seem like a benefit to some, but it can present real challenges: homelife distractions, managing your time effectively and feelings of isolation.

It is important that home workers begin their day as if preparing for work. Get up, shower and dress – i.e. sitting around all day in your pyjamas is unlikely to make you feel professional and ready for business. Additionally, it could give colleagues/customers a shock during video conferencing!

Once ready for work, make sure you have a dedicated workspace in your home. Not everyone will have a home study so try to find a corner where you’re least likely to be disturbed and where you can keep everything you need to carry out your duties. Remember when organising your home workstation the same occupational health requirements that are in effect at your office should still apply: desk set-up, laptop position/monitor height, comfortable chair, etc.
When your work is done, it's done. In other words, keep to your normal working hours. This is your home, so when your day normally ends, put away your workstation and go back to your homelife.

Manage distractions. They're going to happen so accept it and have a strategy for dealing with them. The best way to overcome distractions is to have a to-do list and stay organised. If you need 10 minutes to reset, go right ahead. Then go back to your list.

Take a break (different from distractions). Take several breaks. You should leave your desk once an hour. We are not designed to sit all day so get up and stretch your legs around the house. You need to stay hydrated too, so go to the kitchen and fetch a glass of water. We work more efficiently when refreshed. And don't forget to have lunch, the same way you should were you at the office.

Even if you live alone, you will have colleagues working from home too and dealing with the same issues. Use instant messaging platforms to check in with them, collaborate, or just say ‘Hi’.

**Response to Suspect Case**

The most common symptoms of COVID-19 are a new, continuous cough or a high temperature. For most people, COVID-19 will be a mild infection.

If becoming unwell whilst at work, with a new, dry, continuous cough or high temperature the colleague must be sent home and follow the advice to self-isolate at home.

If a colleague is contacted whilst at work and advised they are a primary contact of a confirmed case, they should be sent home.

On identifying a 'presumed positive' case of Covid-19, on site consideration must be given to the risk to others and the risk of contamination of the environment. If someone helps the ill person to leave site, there is no need for them to be sent home, but they must wash their hands with soap and warm water for at least 20 seconds after touching the affected individual or their belongings and then sanitise their hands.

The minimum PPE to be worn for cleaning an area where a person with possible or confirmed coronavirus (COVID-19) is disposable gloves and an apron. Hands should be washed with soap and water for 20 seconds after all PPE has been removed.
If a risk assessment of the setting indicates that a higher level of virus may be present (for example, where unwell individuals have slept such as a hotel room or boarding school dormitory) or there is visible contamination with body fluids, then the need for additional PPE to protect the cleaner’s eyes, mouth and nose might be necessary. The local Public Health England (PHE) Health Protection Team (HPT) can advise on this.

Employees are entitled to time off work to help someone who depends on them (a ‘dependant’) in an unexpected event or emergency. This would apply to situations related to coronavirus (COVID-19). For example:

- if they have children they need to look after or arrange childcare for because their school has closed
- to help their child or another dependant if they're sick, or need to go into isolation or hospital

Authorisation to Work

We are aware that staff at some member companies have been stopped on the way to work by police asking if their journey is necessary. In the event of this occurrence, your staff should be equipped with a Work Authorisation Letter to show to law enforcement agencies if questioned. The letter should be addressed to the member of staff stating why they are engaged in essential work and that it is not possible to be carried out remotely at home.

Each manufacturer is singly responsible for remaining fully informed about current best practice and always exercising judgment in its workers’ interests and welfare before adopting guidance in its own business.

You should ensure that you keep everyone updated on actions being taken to reduce risks of exposure in your workplace.

HSE

As Britain's statutory regulator of occupational health and safety The Health and Safety Executive (HSE) has taken action to ensure that their role continues effectively as the COVID-19 situation unfolds. These actions are being guided by the specific needs and characteristics of the various sectors that they regulate and in line with advice from the UK Government, Public Health England, Public Health Wales and Health Protection Scotland.
As a consequence, HSE:

- has suspended targeted inspection activity of high-risk industries that are not part of the major hazard sectors, including construction and manufacturing.

- has carried out a short pause on offshore oil and gas and onshore chemical, explosives and microbiological industry inspection activities to give duty holders time to overcome various immediate pressures and challenges and we will then focus our regulatory work, so it is re-prioritised onto critical areas and activities.

- will continue to regulate major hazard industries throughout this time undertaking regulatory functions remotely.

- will endeavour to undertake regulatory activities which do not require site visits as normally as possible, for example Approvals and Authorisation work for biocides and pesticides, Statutory Permissioning activities such as Licensing, Safety Case/Report Assessments, Thorough Reviews, Combined Operations Notifications, Wells Notifications, Land Use Planning Applications, Hazardous Substances Consents etc.

- will, across all sectors, continue to investigate work related deaths, the most serious major injuries and dangerous occurrences and reported concerns from the workforce or the public where people are being exposed to risks from work activities, while taking action to secure compliance with the law.

- conduct as much investigation activity using technology as possible, without compromising the collection of evidence and the ability to secure effective control of risk and, where appropriate, justice.

- will do as much regulatory intervention work as possible remotely, but will still mobilise to site, including offshore, where it's necessary to provide public assurance that hazards are being effectively managed and to secure compliance with the law. Where a site visit is required social distancing guidelines will be followed.
Policy Making

Government policy changes with the escalating scale of the coronavirus; meaning that you will be required to review your company actions at the same rate.

With every new business decision made in response to COVID-19 you are strongly advised to document the date of the action, the rationale behind it and the Government guidance to which the change follows. In this way you will protect the business against legal scrutiny once the pandemic is over.
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