

CIA members' call – operations, regulatory and health issues during COVID-19

Summary note – shared views on options for and timing of easing of site COVID-19 precautions

This purpose of this note is to summarise the weight of views and opinion from member companies and CIA staff on maintaining operational site COVID-19 precautions. The current version reflects the latest announcement of the government on 5 July about the removal of legal restrictions for England from 19 July – noting also that separate announcements for the devolved governments for Scotland and for Wales are still to be made.

The note also sets out CIA's position on the risk assessment approach to determining appropriate precautions, advocated to HSE senior management as the basis for making any changes.

The views were developed and shared during CIA's members' regular calls on COVID Operations, health and regulatory issues in May and early June, and have been updated from discussions on the Site Leaders' equivalent calls.

The information will be kept under review and regularly amended, as the situation can change rapidly, and experience of the pandemic so far has shown that nothing can be taken for granted.

Background and context

The context for this paper includes the following key points:

- While the successful rollout of the vaccination programme continues - and has proven to be effective in managing infection rates, transmission, severity of symptoms and most importantly hospitalisation - the COVID-19 virus crisis cannot be considered to be over or even yet under control. Currently the UK is in a '3rd wave', with rising infection rates but significantly reduced severity of symptoms;
- The efficacy of the vaccines is supported by more widely available testing with free access to home testing, the use of some private testing providers by some companies, and the PCR test. There are still issues around the reliability and accuracy of the Lateral Flow Test option;
- Significant regional variations continue with numbers of infections, and the effects of variants are causing localised surges which can potentially become much more widespread. The Delta Variant first identified in India is still a concern. The success of the vaccine programme has meant that the severity of cases in terms of health risk, hospitalisation and mortality rate is much reduced but there is still a large proportion of the population unvaccinated for various reasons, including choice;
- The policy, guidance and legislation in relation to management of the pandemic has varied in some respects between England and the devolved governments for Scotland, Wales and Northern Ireland;
- In the chemical sector the approach to workplace COVID risk assessment, site precautions, and auditing/monitoring of implementation has proven to be highly successful in maintaining safe workplaces. The main precautions have centred on social distancing; adequate ventilation; good hand hygiene; effective clean-down; and a policy on use of face coverings;
- On 5 July the Westminster government announced the intention from 19th July to remove all legal restrictions and COVID-19 precautions in England. Part of this announcement included that advice to 'work from home where you can' would also be removed;
- Separate announcements for the arrangements for Scotland and for Wales are expected from the Devolved Governments week commencing 12 July – it is not known whether these will follow the approach taken for England;
- Guidance to support the new approach is anticipated, but has not yet been published. We also expect that specific guidance for workplaces will be provided by HSE.

Summary of members' views on easing of site restrictions

Opinions and approaches will of course vary, however based on views expressed by businesses during the discussions on the Operations calls and updated with the Site Leaders calls the majority of sites did not consider any significant easing of restrictions before the original 21 June 'Roadmap' date, and the view has remained the same ahead of the extended 19 July date.

Following the strong mandate from government for the chemicals sector to keep operating through the pandemic as a 'critical worker' sector, CIA member companies have continued to demonstrate their effectiveness at risk assessing and then implementing COVID secure measures at operational sites. Consequently, workplace transmission has been low and feedback from the regulators has generally been positive about the site controls. All this shows that site operators have found ways to maintain production and find ways to work with the COVID precautions and restrictions. Companies have said that based on previous government and regulator advice they do not currently feel empowered to relax restrictions; they are also conscious of how quickly circumstances can change; and recognise that once restrictions are lifted it would be much more difficult to re-impose them. The precautionary approach has been seen to work in our sector.

Most sites were making preparations for easing restrictions in anticipation of July 19th, but in many cases companies have advocated keeping things as they are until September – the rationale being that the vaccine rollout programme will have progressed even further, the peak holiday season will have come and gone, and the national picture with the sharp increase in infection rates linked to the Delta/Indian variant will be clearer.

However, with the government's recent announcements about complete removal of restrictions in England from 19 July in the community, there will be a serious challenge to compliance with any COVID protective measures in the workplace which site operators deem appropriate.

CIA discussions with HSE on future basis for decisions about appropriate COVID-19 precautions

To be able to sustain operations efficiently, while maintaining COVID-safe workplaces, the chemicals industry needs the certainty of the level of precautions necessary for sites matched to the prevailing level of COVID-19 risk. Anticipating the announcements by the government about lifting restrictions during the summer, the discussions between CIA and member companies about the basis for making decisions on which operational precautions need to remain have focused on a risk-based approach which would allow sites to make site-specific informed decisions on the precautions, rather than a 'one size fits all' guidance approach. On behalf of members this approach has been advocated to HSE during a meeting between CIA's Director for Safety & Security, Phil Scott, and HSE's Director for Chemicals, Jane Lassey; and subsequently followed up in meetings with HSE.

HSE remains fully engaged with government and its committees and working groups in developing the national guidance applicable to our workplaces. No significant changes in the regulator's guidance for workplaces has so far been made, but we expect there will be updated guidance linked to the announcements made on 5th July that the intention for England is to remove all legal restrictions from 19th July. It should be noted that separate announcements are still to be made by devolved governments for Scotland and for Wales (expected w/c 12th July), and it remains to be seen whether these follow the same plan and timescale as in England for complete removal of restrictions.

CIA has made the case to HSE that for workplaces, companies should be able to rely on site risk assessments (supported by monitoring and auditing of implementation and adherence to site rules) to determine the level of COVID-19 precautions appropriate to each site. This has worked extremely well in the pandemic so far, resulting in chemical businesses achieving largely COVID-safe workplaces. By setting out for HSE industry's preferred approach we hope to influence any workplace guidance so that businesses can maintain the level of precautions and which specific measures are appropriate for their individual circumstances, based on informed risk assessment.

Options for easing site-based precautions

Before the government announcement about removal of restrictions in England from 19 July, CIA's discussions with member companies covered various examples of COVID-19 precautions that will feature in a risk assessment approach. Indications from government and from the regulators have been given that guidance will be developed to support the general removal of restrictions (for example, when it may still be good practice to continue to wear face coverings). Until we see this guidance, and any implications it has

for the workplace, it is not possible to advise companies; we will update the information in this Paper as soon as we can and in discussion with member companies through our regular open calls.

Below we summarise last position on options that sites were considering, and in many cases may still be considering. The information below cannot be taken necessarily to represent best practice, or even good practice. It is not a recommendation of what businesses should do. As ever, decisions that companies take should be dependent on risk assessment of individual site circumstances, leading to a level of precaution assessed as appropriate for each business, and in the light of government (including Devolved government) guidance. Nevertheless, it may be helpful to share what options some businesses have said they are considering so that these aspects can be considered as the 'return to workplace' plans for home-worked staff accelerate, and as community restrictions are relaxed.

Options for easing specific site-based precautions, when deemed appropriate, were considered under the following headings:

- Temperature monitoring;
- Risk 'Triggers' for return to work and relaxing restrictions;
- Face coverings;
- Ventilation; and
- Social distancing

Temperature Monitoring

Many companies have used temperature monitoring as part of their routine screening of persons attending site, whether regular site-based staff or visitors, as raised temperature is one of the classic symptoms of potential COVID-19. However, temperature monitoring has never been a mandatory requirement and has not been part of HSE's guidance for industry. The reliability is questionable and there has been experience of people showing a high temperature subsequently testing negative for COVID, and people with normal temperature subsequently testing positive. For many companies, this will be one of the first precautions to be removed as it is not considered as robust and reliable an indicator as other measures. Companies continue to communicate to staff that if they have any of the classic symptoms, and/or have shown a positive Lateral Flow Test taken at home, they should not come into work in the first place.

Some companies have said that there is nevertheless a perceived benefit in maintaining temperature checks as a visible reassurance to site personnel that control measures are in place; others have indicated that they intend to keep temperature checks as part of the screening for visitors, but not for their own employees based at site.

Risk 'triggers' for return to workplace and relaxing restrictions

Some sites monitor COVID-19 infection rates in the community as one of the indicators for the numbers of staff expected to work at site – staff identified as essential site personnel or critical to operations having priority for working at site whereas others, including many office-based functions, are more likely to work from home. Companies have set 'traffic light' indicators or bands of community infection level or hospitalisation as triggers for managing numbers on site, so as to reduce the likelihood of introducing COVID transmission to the workplace. Similar approaches have been taken in many companies to setting room occupation numbers limits. In some companies these arrangements have been based on corporate guidance for all company sites, for others it has been UK site based. The measures have been useful particularly as substantial regional variations in the prevalence of COVID in the community have been seen and have resulted in 'local lockdowns'. Companies have indicated they will follow any corporate guidelines unless local requirements are more stringent, and would welcome signals that covering this as part of an overall risk-based approach will be acceptable to the regulators.

Face coverings

Most companies have a policy on use of face coverings to minimise transmission of COVID-19 (differentiated from PPE for occupational exposure risks to hazardous substances), however the practical details of what is required varies between different companies. Most sites have mandated face coverings in indoor spaces unless the individual is at their desk or workstation where precautionary measures such as screens etc have been provided; they are generally required in communal areas or when moving between different indoor areas. Face coverings are also generally required in shared vehicles (similar to the community requirement for face coverings on public transport for example). At the other end of the scale, a minority of sites have decided to require face coverings even when moving about outside between different plant areas.

Clearly the level of compliance will be challenged where people feel that face coverings are unnecessary and if government has removed any legal requirement to wear face coverings; it will of course remain a personal choice for individuals. CIA will continue to discuss and share approaches to these issues on our COVID Operations calls with members to help inform the assessments sites are making for their own businesses.

Ventilation

Even with the removal of legal restrictions, the importance of good ventilation is likely to remain a recommendation. The increased importance of good ventilation as a measure in managing the risk of COVID transmission in workplaces grew as the understanding improved of the risk factors associated with the way the virus can spread. It has become much more prominent in HSE guidance on appropriate measures, and furthermore its importance to general health and safety irrespective of COVID-19 is now better recognised. This has led to sites making a more informed assessment of ventilation, use of mechanical ventilation to introduce fresh air, and the use of CO2 monitors to identify areas of poor ventilation. Some measures however, such as opening fire doors to increase air flow, should of course be specifically excluded.

Many buildings on chemical sites are deliberately designed without windows (for example, control rooms) and while this is a key design feature in the event of potential process incidents it does require alternative means of providing safe levels of ventilation, which has resulted in capital projects in some cases. Generally, the [standards advised](#) in the Chartered Institution of Building Services Engineers (CIBSE) guidance on the levels of ventilation to be achieved are the accepted standard for providing adequate ventilation.

Social Distancing and Building Occupancy Management

The vast majority of companies have continued to adopt the standard of 2-metre social distancing, in addition to the other measures above, as the primary precaution to minimise the risk of transmission of COVID-19. Managing the occupancy levels of buildings has become a significant protective layer in its own right, and against the background of high levels of COVID infections in the community it is likely to be a challenge for many companies and their staff to revert to no social distancing. Businesses may well decide that some sensible approaches to maintaining safe distancing – along with good ventilation etc – is preferable to no controls.

There are limited examples of work on sites where 2m social distancing cannot be maintained in some operations (for example, in some multiple-person essential maintenance tasks where close proximity teamworking is inevitable) and in these cases specific risk assessments and arrangements have been provided for these tasks. But in general, the requirement to maintain social distancing has been recognised and accepted, and has proved a challenge for many companies in how they can manage buildings occupancy when preparing for large numbers of home-worked staff to return to the workplace. Many sites have made arrangements through capital projects to provide additional accommodation, others are adopting 'hybrid' systems of staff working part-time on sites to manage the numbers. These considerations for sites will continue to be an option for sites as the vaccination programme continues to mitigate the severity of symptoms - but not completely remove the possibility of disruptive and costly staff absences.

Conclusion

This paper will remain a work in progress and is likely to be so for some time. We will continue to monitor guidance that we anticipate will accompany the government's lifting of legal restrictions. We will discuss with CIA members through our COVID Operations call, and with other stakeholders including government contacts and regulators, to keep the information updated as the process of emerging from COVID-19 progresses.

At the time of this version, the current position and next steps are:

- Discussing and monitoring the approaches member companies adopt for workplaces following the government's intention to remove restrictions in the community in England from 19 July;
- Taking account of anticipated announcements from the devolved governments for Scotland and for Wales;
- Carefully considering any guidance specific to workplaces in support of the government announcements;

- Reflecting and sharing the views of industry on the level of any restrictions they may choose to keep in place on operational sites beyond 19 July, to help manage the risk of infections resulting in potential disruptive staff absences.

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