

Covid-19 Secure Policy	
Operational Owner:	Director of Health and Safety
Executive Owner:	Chief Operating Officer (COO)
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Related documents:	

Approval History

Version	Reviewed by	Brief reason for review	Approved by	Date
1.0	New Policy	N/A	Gold Command Chair of Health and Safety Committee	10 June 2020 10 June 2020
2.0	Director of Health and Safety, Silver Command, Chief Student Officer	Reviewed and updated	Gold	10 August 2020

1 Introduction

1.1 Purpose

- 1.1.1 This Policy outlines the arrangements adopted by the University for making our facilities and provision available in a way that minimises risks during the Covid-19 pandemic. The University recognises that these arrangements will depend on such factors as the demographic profile of our staff and students, the nature of our institution, including the size and type, and how our institution is organised and managed. The requirements are principally informed by advice and guidance from UK Government, the Covid-19 Secure Guidance, and the Health and Safety Executive (HSE).
- 1.1.2 The purpose of this Policy is to enable the University to operate effectively and allow staff, students, contractors, and visitors (currently authorised to access/work/study/reside on its premises) to undertake their activities during the Covid-19 pandemic without detriment to their health, safety and wellbeing.
- 1.1.3 The University recognises that this is a Policy that focuses on the practical aspects of returning safely to campus and that this will have an impact on some members of the community in terms of individual needs. Line managers will be working with staff to ensure that the returning to work process considers their individual support needs.

1.2 Scope

- 1.2.1 This Policy applies to staff, students, contractors, and visitors authorised to access/work/study/reside on University premises.
- 1.2.2 This Policy applies to all premises under the University's control, including outdoor spaces.
- 1.2.3 As the University continues to operate a phased return for authorised members of staff, students, and visitors, this Policy will be reviewed regularly, with the objective of it applying to every aspect of University business, including all educational, research, commercial, residential accommodation, recreational and management activities.

1.3 Definitions

1.3.1 Social Distancing

Social distancing is a set of non-pharmaceutical interventions or measures intended to prevent the spread of a contagious disease by maintaining a physical distance between people and reducing the number of times people come into close contact with each other.

1.3.2 Personal Protective Equipment

In the UK, the Personal Protective Equipment at Work Regulations 1992 (as amended) apply to the use of PPE, additional regulations apply to the use of respiratory protective equipment (RPE).

PPE protects the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high visibility clothing, safety footwear and safety harnesses. It also includes RPE, such as face masks. A face mask can include a surgical type mask or close fitting RPE designated at FFP3 or equivalent.

For further information on face masks see Appendix 1.

1.3.3 Face Coverings

In the context of the coronavirus (COVID-19) outbreak, a face covering is something which safely covers the nose and mouth. They can be reusable or single use. This includes the use of a scarf, bandana, religious garment or hand-made cloth covering but these must securely fit round the side of the face.

Face coverings are not classified as PPE because rather than protecting the user, they are intended to protect others.

1.3.4 Accessibility

We recognise we have a duty to make reasonable adjustments to ensure that staff, students and service users with a disability do not suffer a substantial disadvantage when doing their job, engaging in study or accessing our services when compared to persons without a disability.

2 Policy

2.1 Principles

2.2.1 Compliance with the requirements of this Policy will ensure:

- The University meets its obligations in respect of legislation.
- The health protection of staff and students, whilst on University premises.
- The health protection of staff and students whilst undertaking University-related activities off-site, including overseas.
- The health protection of contractors authorised to work on our premises.
- The health protection of visitors authorised to access or work on our premises.
- Everyone is aware of their roles and responsibilities.
- That staff, students, contractors, and visitors are appropriately informed, instructed and where necessary trained.

2.2.2 In order to meet the above objectives, the University will:

- Clearly define the organisational arrangements for achieving compliance (see roles and responsibilities section of this Policy).
- Implement current UK Government guidance, translating its requirements into specific actions in relation to the nature of its business. When considering how to apply this guidance, it will take into account staff, students, contractors, as well as other persons who may be affected by University activities.
- Continue to comply with its existing legal obligations relating health and safety, employment and equality.
- Ensure that the risks associated with Covid-19 are assessed and managed through processes of risk assessment and that risk controls are implemented to protect staff and others. It is recognised that the risk of Covid-19 cannot be eliminated and, as such, the University will assess these risks and do everything reasonably practicable to minimise them.
- As part of the risk assessment process, have regard to whether the staff, students or service users are especially vulnerable to COVID-19.
- Consider the assessment of individual health needs through the provision of existing anticipatory procedures for participation and support.
- Use current Government guidance to inform its decisions and control measures, including the

specific circumstances under which personal protective equipment or face coverings are to be worn. Where anyone chooses to wear a face covering or, where mandatory, has a legitimate reason not to wear one, the University will not accept behaviour by others which dissuades or judges a person for making this choice or justifiable decision.

- Ensure that the required actions and behaviours of staff, students, contractors, visitors, and other service users are communicated effectively, including the provision of information, instruction and training (including the provision of signage) for the management of risks.
- Consult with health and safety representatives from the recognised trade unions and staff on the management of risks.
- Engender a culture of question and challenge, where staff, students and others are encouraged to raise concerns or report problems in relation to their health, safety and wellbeing.
- Consider disciplinary action for any person who breaches the requirements of this Policy, associated procedures and regulations, or endangers them self or others.
- Continually review its risk management arrangements to ensure they remain effective, and in accordance with any updates in legislation and Government guidance.

2.3 Policy Procedures

2.3.1 Risk Assessment

In accordance with Government guidance, as part of the process of opening buildings and campuses as well as the continued phased return of staff and students, the University will use risk assessment to inform its decisions and control measures. Such an approach will be integrated into every aspect of University business, including all educational, research, commercial, residential accommodation, recreational and management activities. These risk assessments will establish the measures necessary, including social distancing, other mitigating actions, the circumstances under which PPE is required, and any other precautions necessary to manage the risk.

2.3.2 Social Distancing

In accordance with UK Government guidance, the University will take action to maintain the advised social distancing wherever possible.

Where the social distancing guidelines cannot be followed in full in relation to its premises and activities, the University will establish (through the process of risk assessment) whether that activity can be redesigned, or the environment reconfigured to maintain a 2m distance or 1m with risk mitigations (where 2m is not viable).

Mitigating actions that the University may implement include measures such as:

- Keeping the activity time as short as possible.
- Using screens and barriers to separate people from each other.
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible*.
- Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others).
- Promoting frequent hand washing and surface cleaning.
- Any other action identified to be necessary, including in response to updates in Government guidance.

* Where such measures are adopted, consideration will be given to the impact on people with hearing impairments and other long-term health needs/disabilities, and how they can be supported.

To assist with the risk assessment process, the University will apply the existing [Government guidance](#) which identifies the steps that will usually be needed to maintain social distancing in a range of different working environments/workplace activities, as well as those specifically relating to the [Higher Education sector](#).

The University recognises that through the risk assessment process it may not always be possible to keep the stated social distancing requirement in respect of its premises and activities. Where social distancing guidelines cannot be followed in full, even through redesigning a particular activity, the University will consider whether that activity needs to continue, and:

- If not, discontinue the activity.
- If so, take all the mitigating actions possible to reduce the risk of transmission, and before continuing with the activity.

2.3.3 Personal Protective Equipment (PPE)

The University recognises the UK Government's advice and guidance in relation to the use of PPE and that it advocates the use of alternative more effective control measures. It also acknowledges that PPE is in limited supply and that supply is prioritised for the NHS and other front-line higher risk services. It also accepts that it is a challenge to wear PPE for prolonged periods of time and maintain effective hygiene controls.

Where personnel are already using PPE/RPE in their work activity to protect against non-COVID-19 risks, the University will continue to comply with its existing legal obligations by providing such equipment in accordance with the Personal Protective Equipment at Work Regulations 1992 (as amended), and other relevant regulations and guidance.

For Covid-19 risks, the University will provide PPE/RPE where the risk assessment identifies it to be necessary and, only, if it is needed after implementing other measures/controls. Such PPE/RPE will be subject to the requirements of relevant regulations, face fit testing and training requirements.

Examples of where the University has currently assessed PPE/RPE as necessary include:

- Specific laboratory work.
- Some incidences of clinical teaching/learning.
- First aid responders assisting an individual who is symptomatic and may have COVID-19.
- Cleaning workplaces following illness or first aid incidents where there may be contact with body fluids.
- Accessing accommodation where residents are symptomatic (i.e. maintenance and security staff).

Standards of enforcement procedure apply to the use of PPE/RPE where designated as a control measure and will be linked to the mandatory signage and operating procedures.

2.3.4 Face Coverings

The University recognises the UK Government regulations on the wearing and advice/guidance on the safe use of face coverings. There is evidence to suggest that, when used correctly, face coverings may reduce the likelihood of someone with the infection passing it on to others, particularly if they are asymptomatic.

At the University, the wearing of a face covering is required:

- In all settings mandated by [English law](#), and where relevant to University activities/premises.
- In all settings mandated by the relevant laws of other countries (including Northern Ireland, Scotland, Wales), when travelling on University business or at University expense.
- Where a risk assessment identifies wearing as a precautionary measure, and only after other more effective measures have been considered.
- In all shared indoor University spaces, including whilst moving through buildings and within

teaching, learning and study environments.

In some exceptional circumstances a face covering will not be required to be worn. This includes:

- Not being able to put on, wear or remove a face covering because of a physical or mental illness or impairment, or disability, or without severe distress.
- If you are providing assistance to someone who relies on lip reading to communicate.
- Within a single occupancy office and when seated at your desk within a shared occupancy or open plan office, where appropriate social distancing measures are in place.
- Within University residential accommodation, where such accommodation is your 'home' (i.e. where you live whilst at University). The only exceptions to this are:
 - Anyone who is living in halls of residence or other University-managed accommodation, who are self-isolating or have active symptoms. These individuals will be required to wear a face covering in the event of an emergency evacuation as well as maintain social distancing during the evacuation, at the assembly point, and on re-entering the building.
 - Within the communal areas of accommodation, where everyone is advised to wear a face covering.
- If giving a lecture, leading a seminar or a teaching session and when the wearing of a face covering would impede communication.
- Within a catering establishment when using table service or when reasonably necessary to eat or drink.
- When undertaking sporting or fitness activities where a risk assessment has taken place and other mitigating measures are identified and implemented.
- When undertaking a formal University activity which has been risk assessed and identified as not being conducive for the wearing of a face covering (e.g. dancing/singing as part of a programme of study/research).
- Instances for safety and security reasons that necessitate an individual to remove a face covering for identification purposes. Such request should be undertaken in a well-ventilated location, ensure good hygiene practices, and maintain adequate social distancing.

The University considers that responsibility for wearing a face covering sits with individuals and, as such, will take reasonable steps to promote compliance with the law and University requirements through the provision of signage and other means of communication.

For further guidance on face coverings, refer to the [UK Government guidance](#), which all staff and students should be aware of, including how to wear a face covering and making your own face covering.

2.4 Roles and Responsibilities

2.4.1 Gold Command will approve this Policy, including any future revisions.

2.4.2 Silver Recovery Group will monitor the continued effectiveness of this Policy and review its requirements in response to the recovery and phased return for staff and students, the periodic updating of Government guidance, and whenever there is a significant change or reason to believe it is no longer valid.

2.4.3 Director of Health and Safety

The Director will be responsible for:

- The provision of advice and guidance on the application of legislative requirements.
- Where necessary, liaising with the enforcement authorities.

- Reporting incidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

2.4.4 Members of staff/students

In addition to the responsibility to take care of their own health and safety and take due consideration for the health and safety of others, the University requires members of staff and students to:

- Not come onto campus or leave their halls of residence/accommodation if they or anyone they are living with has symptoms of Covid-19, in the case of staff informing their line manager, and students by completing the [online form](#) immediately. They must then:
 - Arrange for a test as soon as possible (via NHS Test and Trace service) and stay at home and wait for the results.
 - Where the results are positive for Covid-19, self-isolate in accordance with current [Government guidelines](#) and inform their line manager/personal tutor immediately. Only return to campus/work/study when the required self-isolation period has expired, the resultant fever has subsided, and they feel recovered enough.
 - Where the results are negative, return to campus/work/study when they feel well enough.
 - If you're told by the NHS Test and Trace service that you've been in contact with a person who has coronavirus (COVID-19), stay at home for the required self-isolation period.
 - Co-operate with the University in respect of any information requested to assist Public Health England (PHE) with contact tracing and comply with any subsequent advice to self-isolate.
- If, whilst at work or on University premises, they start to experience COVID-like symptoms, they should leave the campus or return to their accommodation immediately and:
 - for staff: inform their manager; and
 - for students: complete [the online form](#),
 at which point, the above requirements on testing, self-isolation, and test and trace will then apply.
- At all times respect the UK government social distancing guidelines, where this is possible.
- Ensure they continue to practice effective respiratory and hand hygiene procedures, frequently washing their hands for 20 seconds or more and/or using hand sanitizers.
- Whilst on University premises and/or undertaking work activities, adhere to the findings of any risk assessment, and the requirements of any information, instruction and training (including induction and signage) provided.
- Wear PPE/RPE in accordance with instruction and training.
- Adhere to any regulations or requirements for the wearing of face coverings and follow any advice and guidance on safe use and hygiene protocols. It is recognised that the responsibility for wearing a face covering sits with individuals.
- Bring without delay to the attention of their line manager or person responsible for the area or activity, any identified hazards, concerns or necessary improvements.
- Not intentionally or recklessly interfere, misuse or remove anything provided in the interests of health, safety and well-being (e.g. sanitizing equipment or signage).

Note: The above requirements are in addition to staff and students complying with other University policies and standards, and relevant arrangements for the area or activity.

Failure to comply with the above requirements may be regarded as a breach of English Law and /or University Regulations and may result in disciplinary action.

2.4.5 Contractors (including agency staff and consultants)

In addition to the existing obligations in relation to their operations, all contractors will be

required to:

- Comply with this Policy.
- If, whilst on University premises, they start to experience COVID-like symptoms, leave the campus immediately and inform their University site contact.
- Co-operate with the University in relation to the implementation of its Covid-19 secure measures.
- Conduct their own risk assessments in accordance with UK Government guidance, including the provision of PPE/RPE.

Note: University staff that appoint contractors are responsible for managing any such contractor who provide services and/or work in premises occupied by or on behalf of the University.

2.4.6 Visitors

All visitors to the University are required to follow any health and safety instructions given to them.

2.4.7 Supporting behaviours

While individuals may have differing views as to the adequacy of current UK Government guidelines or the effectiveness of our response to these requirements, this is a situation in which the actions of one may affect the health, safety or wellbeing of another and, therefore, there will be an obligation to comply with the University's agreed requirements and guidelines.

The primary objective of any enforcement action will be to protect members of our University community, including those we interact with as part of every aspect of our business. The secondary aim will be to change behaviour and to prevent re-occurrence.

Staff and students will be encouraged to work as a supportive community, and will not be expected to routinely report on, observe others, or police behaviour. The University community will be signposted to report concerns through the [Report and Support portal](#), where any "hotspots" may be identified for action by local bronze teams. This may initiate a change in planning, signage for that area, or other appropriate response. In the cases of individual non-compliance, education will be the initial response, undertaken by the line manager or the personal tutor or programme leader. Those who contravene the requirements and/or guidelines on a serial or serious basis will be managed through the existing disciplinary process, taking into consideration the secondary aim of preventing re-occurrence. This may mean more apparent serious sanctions such as restriction of access to University facilities are undertaken over sanctions such as warnings or fines.

3 Governance Requirements

3.1 Implementation / Communication Plan

3.1.1 The Policy is communicated to all staff and students as part of the Coronavirus advice webpages.

It is also communicated through specific, relevant training, including inductions and specific training sessions for staff and contractors 'Green Book' training (repeated every 12 months).

Relevant Health and Safety Committees and EFCS Committees will be notified and information disseminated through line management.

The Policy is communicated through the 'Green Book', available on the EFCS website and H&S Intranet sites.

3.2 Exceptions to this Policy

3.2.1 There are no exceptions.

3.4 Review and Update

3.4.1 In view of the periodic updating of Government guidance, this Policy will be regularly reviewed to ensure it takes account of these changing circumstances.

3.4.2 This is an evolving document and the impact of different groups of people particularly in relation to equality impact will be continually monitored, and adjustments and support provided as circumstances change/develop. This will include a review of the Equality Impact Assessment.

3.4.2 All changes will be reviewed and agreed by Silver Recovery Group and approved by Gold Command.

3.5 Legislative context

3.5.1 The requirements of:

- The Health and Safety at Work etc. Act 1974 and associated subordinate legislation
- The Equality Act 2010
- The Health Protection (Coronavirus, Restrictions) (No.2) (England) Regulations 2020
- The Health Protection (Coronavirus, Wearing of Face Coverings in a relevant place) (England) Regulations 2020.

3.5.2 *Policy Legal Statement*

This policy sets out to comply with the required 'duty of care' placed upon the University. Under Health and Safety Law a 'duty of care' is generated between organisations and individuals when carrying out activities that could foreseeably cause harm.

The primary duty of care is owed through the employer-employee relationship in which the employer owes a duty of care to ensure that work activities that could result in harm to the employee are assessed and controlled. That duty of care is put into practice by the line management responsibilities as set out in the hierarchy of the organisation.

This duty of care cannot be delegated away; instead the act of delegation must be accompanied by a realistic and workable system of monitoring or supervision to ensure that the delegated task has been adequately implemented (i.e. the responsibility is not met by giving directions; it is met when those directions have been confirmed as carried out). The result is a cascade of delegated accountability that runs through the organisation via the line management network, accompanied by a system of monitoring, supervision and feedback.

The duty of care extends to assurance that services provided by others (be they another department of the University or contractors) are undertaken safely. The level of assurance required should be commensurate with the risk of the activity. In addition, anyone carrying out an activity owes a duty of care to anyone who may be put at risk by the activity, such as students, staff and visitors.

3.5.2 Other References:

[Our plan to rebuild: The UK Government's COVID-19 recovery strategy](#)

[Higher Education: re-opening buildings and campus safely](#)

[Health and Safety Executive guidance on working safely during the coronavirus outbreak](#)

3.6 Stakeholder Statements

- 3.6.1 **Equality:** Consideration is given to the protected characteristics of all people groups identified in the Equality Act 2010. The protected characteristics include: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

The University has legal obligations to ensure it has due regard to equality in implementing measures under this Policy, and that this Policy does not unlawfully discriminate against groups who share a protected characteristic. This Policy and all other associated health and safety related policies take this into account.

- 3.6.2 **Health & Safety:** This Policy forms part of the overarching statement on health and safety for the University.

- 3.6.3 **Gold Command, Silver Recovery Group, Executive Board, Health and Safety Committee, and Health and Safety Consultative Committee (as required).**

Changes to this Policy will be consulted, reviewed and approved at the appropriate level, in line with policy guidance.

Appendix 1

There is a variety of PPE used to control the transmission of infectious diseases. This ranges from sophisticated full-face respirators, to simple disposable fluid repellent medical masks, to a simple medical face mask that covers the nose, mouth and chin. They prevent droplets from reaching these parts of the wearer's face and reduce the spread of infectious droplets from the person wearing it. All types of medical face masks are designed to meet quality standards.

Uses for Masks

- Masks are loose fitting, covering the nose and mouth.
- Designed for one-way protection, to capture bodily fluid leaving the wearer.
- Example – worn during surgery to prevent coughing, sneezing, etc. on the patient.
- Contrary to belief, masks are not designed to protect the wearer.
- The vast majority of masks do not have a safety rating assigned to them (e.g. NIOSH or EN).

Uses for Respirators

- Respirators are tight fitting masks, designed to create a facial seal
- Non-valved respirators provide good two-way protection, by filtering both inflow and outflow of air.
- These are designed protect the wearer (when worn properly), up to the safety rating of the mask.
- Available as disposable, half face or full face.
- They have safety rating and EN number.

Common standards

- FFP3 mask: a European standard disposable respirator that seals the nose and mouth and offers a very high level of filtration of particles in aerosols (99%).
- N95 masks: an American standard disposable respirator that seals the nose and mouth, it offers a lower level of particle filtration (95%, equivalent to the European FFP2 standard).
- Surgical masks: fluid resistant mask that covers the mouth and nose but is not sealed.

Regulations and HSE advice

In the UK, the Personal Protective Equipment regulations 2002 apply to the use of PPE, additional regulations apply to the use of respiratory protective equipment (RPE):

<https://www.hse.gov.uk/pubns/books/l25.htm>

The selection and use of PPE/RPE is often associated as a control measure of last resort and is linked with both the control of substances hazardous to health regulations 2002 and the management of Health and Safety at Work Regulations 1999 and the requirement for employers to undertake risk assessments.

Detailed advice and guidance on the use of RPE can be found on the HSE website at:

<https://www.hse.gov.uk/respiratory-protective-equipment/index.htm>

Additional requirements also apply to face fit testing and the use of RPE.

<https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm>