WISH   Waste Industry Safety and Health Forum

INFORMATION DOCUMENT

COVID-19 AND WASTE MANAGEMENT ACTIVITIES

This is version 9 of WISH's COVID-19 information document released on 6 January 2021. It is based on government advice, industry experience and current knowledge, all of which is subject to change. You should first always follow the latest government advice (https://www.gov.uk/coronavirus). This continues to be a developing situation and links may be superseded between revisions of this document – check that the information you use is the most recent.

It is __NOT__ the intent of this information sheet to provide a general and comprehensive 'one-stop-shop' for advice on COVID-19. The emphasis is on waste management workplace specific issues. You should also read and understand the available government and other advice (such as noted above, and in the links in section 6 and throughout this sheet). Use these in conjunction with this document. These links are provided without prejudice - their inclusion does not imply WISH's approval.

This is a 'live' document and may be further updated. If you have any comments please send them to info@wishforum.org.uk.

Note – COVID-19 crosses-over public health and workplace health and safety issues. Public health is devolved in Scotland and Wales. Workplace health and safety is not a devolved matter. The government guidance noted above should be considered alongside local public health requirements and legislation and guidance in Scotland and Wales. For advice for businesses in Scotland and Wales see links throughout this document and in section 6.

Tip – advice, guidance and resources on COVID-19 are available from various sources, including graphics on how to wash your hands, symptoms and similar. These are generally free to download and use. You may want to use this type of resource as posters, hand-outs etc for employees and similar to reinforce issues such as good hygiene.

Waste Industry Safety and Health Forum

CONTENTS

For ease of accessing updates a brief summary of significant changes since the last version of this document is provided in green italic text at the start of each section.

1. COVID-19 and waste management

Changes from previous version: There are no significant changes to this section.

The COVID-19 pandemic represents an unprecedented situation. The below is based on advice and information available at the time of preparation and this information sheet and may be updated over time. Please check the issue number and date against the WISH website (https://wishforum.org.uk/) to ensure you have the most recent version.

What is COVID-19?

Coronaviruses are a large family of viruses that can cause illness such as respiratory tract infections. The novel coronavirus, known as SARS-CoV-2, is a new strain that had not been previously identified in humans. The virus is a problematic pathogen because of how easily it is apparently spread from human to human and because it has the potential to mutate. Research has shown that when uncontained one person, even when asymptomatic, may infect up to three others, and new variants may be even more infectious.

Why can COVID-19 be a problem for the waste industry?

To limit the spread of the disease it is important that individuals self-isolate if they, or their family, have symptoms, they have been instructed to do so via the NHS test-and-trace system (called 'test-and-protect' in Scotland and 'test, trace and protect' in Wales) or if they are extremely vulnerable. This could result in significant absence from work. While indications are that absence in the waste management sector has been lower than may have been originally feared, clusters of absence as the result of 'spikes' of COVID-19, and as a result of instructions to isolate, could still have a significant effect on the delivery of essential waste management activities.

COVID-19 and RIDDOR reporting

The HSE (Health and Safety Executive) has released guidance on reporting of COVID-19 cases under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations). See: https://www.hse.gov.uk/coronavirus/riddor/index.htm. However, that a waste operative may potentially have contracted COVID-19 from a workmate, such as if they shared a vehicle cab during their work, would not on its own make this reportable as an exposure to a biological agent at work without further evidence of direct causation. Further information is available at the link above and in section 6 of this document. If in doubt, contact the HSE for advice.

2. Symptoms and what to do if an employee shows or reports the symptoms

Changes from previous version: There are no significant changes to this section.

What are the symptoms?

The primary symptoms are reported as being fever, dry cough and in some cases a loss of the senses of smell and/or taste. For more detail see: https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/.

What to do if an employee shows the symptoms of COVID-19

Advice for those who believe they may have developed symptoms is available at: https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance, or https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/pages/advice-for-employers/, or https://gov.wales/self-isolation-stay-home-guidance-households-possible-coronavirus.

If a person with no symptoms themselves has only been in indirect or potential contact with someone who has or is suspected of having COVID-19, there is no automatic reason for them to stop work and go home. Likewise, if one employee has been confirmed or is suspected of having COVID-19 there is in general no automatic need to send the whole of the rest of the workforce home, although close workplace contacts may in some situations need to self-isolate (see subsection below on testing and the NHS 'test and trace', called 'test-and-protect' in Scotland and 'test, trace and protect' in Wales, scheme, and its associated guidance). However, a thorough cleaning of the area they work in (office/cab/rest room etc) is strongly recommended (see links below under cleaning procedures for advice). Should an employee show the symptoms of COVID-19 while at work:

- Instruct them to leave work immediately and follow government advice, including to apply for a COVID-19 test, even if they state they feel well enough to continue to work
- Instruct them to stay at home to recover and follow government advice, which is to self-isolate unless symptoms become worse, in which case they should follow NHS advice via https://111.nhs.uk/covid-19, or https://www.nhsinform.scot/self-help-guides/self-help-guide-coronavirus-covid-19, or https://111.wales.nhs.uk/SelfAssessments/symptomcheckers/COVID19.aspx)

- Instruct them not to return to work until free of fever, feeling well enough **AND** a minimum of 10 days have elapsed since the first onset of symptoms (see also government and/or devolved administration advice as noted above, as isolation may need to be longer)
- Instruct them to contact their workplace should they subsequently be confirmed as having COVID-19 (provided they are well enough to make such contact)
- Instruct them to contact their workplace after the 10 days (as above) have elapsed and if they are well enough to return to the workplace
- Clean their work area (office, vehicle cab and similar) thoroughly before allowing other persons to access them (see links below under cleaning procedures for advice)

Should an employee develop symptoms while not at work, they should be instructed to notify their employer via telephone, e-mail, text or similar as soon as they believe they have the symptoms. They should be instructed **NOT** to come into work to inform their employer. The same basic process as above should then be followed.

Employees returning to work after a period of self-isolation, or having recovered from COVID-19, may face adverse reaction from their workmates for reasons of a perceived continuing risk of infection. Whatever the validity or otherwise of such reactions, employers should be aware of this risk and manage returns to work to avoid potential discrimination. For example, the reinforcement of anti-bullying policies and similar. Employees returning from furlough may also receive adverse reaction and resentment from those who have worked throughout the 'lockdown' periods and employers may need to consider this. This effect may be particularly significant if those who continued to work feel that those who have been on furlough have 'had an easy time of it'.

In addition, employers should consider, dependent on the length of absence, whether returning workers require reinforcement or repeat training and/or updating on any changes in work methods, processes and controls which may have been made during their absence.

3. Controlling the spread of COVID-19 – general precautions

Changes from previous version: Significant changes to this section include updates of links, brief mention of situations where waste personnel may need to enter internal spaces where face-coverings have been mandated and clarifications on the use and effectiveness of face shields/visors as well as on vulnerable and clinically extremely vulnerable persons.

Controlling the spread of COVID-19 and workplace advice

Full details of all of the routes by which COVID-19 is transmitted remain uncertain. The two main methods currently being used to reduce transmission risk are hygiene and 'Social Distancing' ('Physical Distancing' in Scotland), although ventilation can also be a significant additional control in some situations.

Note – COVID-19 crosses-over between public health and workplace health and safety matters. The primary aim of this document is to provide workplace advice. Public health is a devolved matter, with separate organisations in England (Public Health England), Scotland (Health Protection Scotland) and Wales (Public Health Wales). Workplace health and safety is not a devolved matter, and for the majority of waste management operations in all three countries the Health and Safety Executive is the regulator. It is inevitable that in some cases workplace guidance on COVID-19 also includes public health issues and public health advice can also include workplace matters. Operators need to ensure they are fulfilling both their workplace and public health responsibilities and should read guidance with care to ensure they are applying the appropriate standards. Notwithstanding the above, the aim in all cases is to eliminate or reduce to the reasonably practicable minimum the risks associated with COVID-19 This should also be objective of waste management operators.

Government has issued various workplace guidance documents. While none is specific to waste management, they provide useful advice on reducing the risk of COVID-19 in the workplace. For example, the guidance on warehousing may be of use to recycling plants, on vehicles to collection activities and on construction to HWRC/CA sites and landfills. See: https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19. In addition regards waste collections, see: https://www.gov.uk/government/publications/coronavirus-covid-19-advice-to-local-authorities-on-prioritising-waste-collections?utm_source=859cf9bb-743b-40c1-8818-67cbad91f13f&utm_medium=email&utm_campaign=govuk-notifications&utm_content=daily

Advice has also been produced by the devolved administrations. For example, see as appropriate: https://www.gov.scot/collections/coronavirus-covid-19-guidance/ and https://www.gov.scot/publications/coronavirus-covid-19-phase-2-business-and-physical-distancing-guidance/ and/or https://gov.wales/coronavirus-covid-19-guidance-prioritisation-waste-and-recycling-collection-services and https://gov.wales/workplace-guidance-employers-and-employees-covid-19.

The HSE has also released advice on COVID-19 working safely. This is available at: https://www.hse.gov.uk/coronavirus/working-safely/index.htm, and operates a 'Contact HSE' service including COVID-19 at: https://www.hse.gov.uk/contact/index.htm.

> **Tip** – in addition to the workplace advice provided by Government, the devolved administrations, and the HSE, a variety of other guidance documents for the public have been released. As noted above, waste operators may want to be careful that they are applying overall and workplace advice, which may differ to advice aimed solely or mainly at the public.

Risk assessment

Employers must undertake their own assessments which take account of their situation and circumstances. It is not the intention of this document to dictate a specific format or content for assessments – this is a matter for individual employers. However, the suggestions and considerations given below may assist: These are suggestions and not intended as requirements. Please note that having a risk assessment in place would not, by itself, ensure that a workplace is 'COVID-19 secure'.

Employers need to go beyond simply writing an assessment – the precautions arrived at must be in place, monitored to ensure compliance and updated as required to reflect new information and developments. 'COVID-19 secure' is an expression not the whole of, or end of, a process. See also HSE advice at: https://www.hse.gov.uk/coronavirus/working-safely/risk-assessment.htm. In addition, the information at: https://www.hse.gov.uk/coronavirus/assets/docs/talking-with-your-workers.pdf and https://www.hse.gov.uk/coronavirus/working-safely/protect-people.htm and/or https://gov.wales/covid-19-workforce-risk-assessment-tool and/or https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-individual-risk-assessment-for-the-workplace/ may also be of use.

Note – the risk assessment process should include a meaningful 'interrogation' of existing work practices and controls to ensure they are adequate. COVID-19 has introduced a new factor and the interrogation of existing controls and practices needs to take this into account. Starting with what current work practices and controls are and 'reverse-engineering' a risk assessment to justify these with no change is unlikely to represent the lowest reasonably practicable risk situation or be an acceptable practice.

Tip – WISH has produced a reference document (WISH REF 07 example COVID-19 checklists – available on the WISH web site). While the checklists provided in this reference document are only starting point examples and need customising and adding to take account of an employer's specific circumstances, they may be useful in checking that your risk assessment covers the general areas it needs to. See: https://wishforum.org.uk/ under resources and reference documents.

Tip – the TUC (Trades Union Congress) has established a database of publicly available example COVID-19 risk assessments, available at: https://covidsecurecheck.uk/risk-assessments/. This database currently includes more than 260 publicly available examples of COVID-19 risk assessments. While WISH makes no comment on, or gives any approval to, the quality of any risk assessment on this database, and responsibility for an assessment being suitable and sufficient rests firmly with the employer, seeing examples of what other organisations are doing may be of use to employers when compiling their own COVID-19 risk assessment/s.

Risk assessment is one of the fundamental underpinnings of health and safety management. Assessments may be workplace, task specific or aimed at particular risks. For example, an asbestos risk assessment aimed at the specific risk of exposure to asbestos. A COVID-19 risk assessment may be best, at a business level at least, considered in this latter category. In this case, the specific risk is the spread of COVID-19. The hazards are situations, activities, tasks, work areas and similar where transmission may occur. It may also be useful to consider the pathways through which a hazard may result in the risk occurring, such as spread via shared touchpoints, direct physical contact, and airborne transmission.

Many employers have taken overarching precautions to reduce the risk of the spread of COVID-19. For example, requiring those who can work from home to do so (for information on home-working see: https://www.hse.gov.uk/msd/dse/home-working.htm?utm_source=govdelivery&utm_medium=email&utm_campaign=coronavirus&utm_term=headline-dse&utm_content=digest-19-aug-20 – also of use during lockdowns when it may be mandated that those who can work from home must). Or providing information to employees such as on what to do if an employee starts showing the symptoms, staggering work hours etc. This type of overarching precaution may best be considered in a 'general work hazards' or 'business-level' assessment with the aim of assessing if the overall precautions being taken at a business level are adequate. This approach may avoid significant repetition within specific assessments.

Beyond these business-level precautions, specific controls may be required for specific activities, tasks, work areas etc. For example, in a recycling plant the 'task-hazard' of picking from a picking line may be identified as requiring specific controls. The transmission routes by which spread could occur can then be considered to arrive at controls, such as reducing the number of persons in a picking cabin at any one time by running two shifts instead of one, glove use (which should already be in place), frequent hand washing, using every other waste chute and staggered entry to picking-cabins to provide Social Distancing, regular cleaning of touchpoints such as conveyor controls etc. The specific advice in section 5 of this guidance may assist in identifying tasks, work areas etc and controls. Likewise, the government workplace advice documents and HSE advice noted above may also be useful.

Assessments should also consider who may be harmed. For task assessments this may be those involved in the task or in the work area, or it may be third parties such as members of the public. For business-level assessments this may, for example, include how any vulnerable or extremely vulnerable persons are being protected (see section below).

As for other assessments, involvement of the workforce and worker representative can provide useful input. Such involvement may also assist in achieving workforce buy-in and help with compliance. See advice at: Talking with your workers about preventing coronavirus (hse.gov.uk)

Ultimately, the purpose of a risk assessment is to ensure that adequate controls are in place. In this case to reduce the risk of COVID-19 spread. These controls may be at a business level, or specific to a task, work area etc. In addition, and as for other risks assessments, being able to demonstrate a clear link from hazard, through pathway to risk may provide the best approach to ensuring control adequacy.

> **Tip** – employers, in consultation with employees, decide how they structure their risk assessments. COVID-19 issues and controls may be added to existing task or activity assessments. However, an overarching assessment of precautions taken at a business level may be required. This could be in the form of a statement of the approach the organisation has taken to dealing with COVID 19 issues. In addition, having a single assessment summary taken from task assessments, or statement, may be better when communicating with employees. This is a matter for employers to decide.

> **Tip** – it is a legal requirement for employers who employ more than five people to record the significant findings of their risk assessments. These findings would include outcomes, such as controls, but may also include the process by which these controls were arrived at and the information, guidance and standards used as inputs to the assessment. This information document provides input to assessments, such as the specific controls in section 5 and, for example, the hierarchy of controls given in the sub-section on collections activities. If an employer believes such controls are not reasonably practicable for their situation, they would be wise to include a justification of why not in their significant findings, or potentially face challenge, including legal and regulatory, as to the validity of their assessment.

Good hygiene

The **MOST** important control for preventing the spread of any infection is good hygiene. This cannot be over-emphasised. Good hygiene practices should already be in place in waste management operations – these **MUST** be maintained. Employees should be instructed to:

- Use tissues to cover mouth and nose when they cough or sneeze (**CATCH IT**)
- Place used tissues in a bin (or bag) as soon as possible (**BIN IT**)
- Wash their hands regularly with soap and water (**KILL IT**)
- Clean surfaces and contact points regularly to get rid of germs (**KILL IT**)

For the above to be effective, employees need to have tissues available and, if employees are not site based, bags should also be available to dispose of used tissues. Employers should provide these.

As the pandemic has progressed over time there may have been a temptation to concentrate on other measures, such as screens and face-coverings. However, the first and most important control is good hygiene.

'Social Distancing'

The use of 'Social Distancing' ('Physical Distancing' in Scotland) is also included in government advice. In general, this means keeping 2 metres (>6 feet) away from other people. Or, where this is not reasonably practicable introducing other measures which, so far as is reasonably practicable, reduce the overall risk of infection. The aim being to reduce the risk of infection to a level at least equivalent to, or better than, that achieved at 2 metres.

Social Distancing can pose issues for some waste management activities – see specific advice in section 5 below. In general, you should consider precautions such as staggering shift changeovers, not requiring drivers to collect lorry keys in person, staggering use of welfare facilities, limiting the number of people allowed at any one time in offices, welfare facilities and other areas and similar. While not aimed specifically at waste management, see also Government workplace advice documents at https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19 for examples of workplace advice on Social Distancing. As relevant, see also: https://gov.wales/keep-wales-safe-work-html and/or https://www.gov.scot/publications/coronavirus-covid-19-returning-to-work/.

Note – the above principle of 2 metres remains in force, despite various dispensations given in specific situations. In its guidance on Social Distancing in England HM Government states: "*businesses should maintain 2 m distancing wherever possible*". Reductions from 2 metres need to be accompanied by the use of other measures to reduce risk.

The principles of Social Distancing remain the same - the further away you are the lower the risk of transmission, and where complete Social Distancing is not reasonably practicable, the less time spent in closer proximity the lower the risk:

First, where reasonably practicable, maintain distancing of at least 2 metres

Where this is not reasonably practicable, minimise the time spent at less than 2 metres and as reasonably practicable introduce other controls to reduce risk

The **aim** being to achieve a risk level equivalent, or better, than that achieved at 2 metres.

Note – searches on the internet may reveal older and superseded advice on distancing and definitions from other countries or guidance aimed at industries and sectors other than waste management. Current government and waste industry applicable advice should be used.

Cleaning procedures etc

Cleaning procedures should already be of a high order in any waste activity for basic hygiene reasons. Government advice specifically in relation to COVID-19 is available at: https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings or https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/. You should reinforce cleaning arrangements and consider the below:

- Ordinary cleaning, such as with soap and water, alcohol sprays, normal cleaning agents or disinfectant, will kill virtually all virus
- Damp dusting should replace any dry dusting
- Telephones and computer equipment should also be cleaned with wipes or by other means by following government guidance
- Cleaning of crockery and utensils can be conducted using hot water and detergents
- Shared facilities, such as toilets and showers, should be cleaned frequently, including door handles, toilet flush handles/buttons and similar 'touch surfaces'
- Staggering access to shared facilities may also assist with distancing. For example, staggering times when employees change out of/into workwear in locker rooms, the use of welfare facilities etc
- Good hygiene should be maintained for workwear and laundry services. Used workwear should be placed in bags and not left in a 'pile' on the floor. Laundry bags should themselves be laundered (to prevent secondary contamination) or disposable bags used. See also guidance at https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings\ or https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/
- In some cases, employees take their workwear home to launder. In these situations, employees should change out of their workwear before going home. Workwear should be bagged, such as in a 'bin-bag', and the same precautions as in the links above taken, such as using a 'hot' wash-cycle

Handling wastes – can I catch it this way?

Research indicates the virus can survive on surfaces, although unless at high concentrations/loadings the risk of transmission is likely to be low. It is good practice to ensure a high standard of hygiene when handling waste materials, as should always be the case in all waste management activities. The virus survives on the skin for more than enough time to allow hand to mouth/nose/eyes transmission.

There may be discarded materials from individuals who are themselves infected with COVID-19. Members of the public who are self-isolating are being asked to double bag any discarded tissues etc and leave for 72 hours before placing them in their main residual waste bin/bag (see: https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection or https://www.gov.scot/coronavirus-covid-19/. This only applies to those who suspect or have been confirmed as having contracted COVID-19 and are self-isolating.

Waste management employees undertaking tasks which may bring them into contact with wastes should already be working under appropriate precautions, such as glove use. Outside of the issue of COVID-19, wastes by their nature may be contaminated, including biological contamination. These normal precautions should continue.

Where waste has already been designated as 'clinical waste', clinical waste procedures should already be in place. Those procedures can be followed as normal.

PPE (personal protective equipment)

Two types of PPE are often quoted relating to COVID-19: gloves and masks/face-coverings.

Gloves

To be effective glove use needs to be in conjunction with good hygiene measures, and good 'glove discipline'. For example, if an employee stops work to eat/drink/smoke the basic process is gloves off, wash hands thoroughly, eat/drink/smoke, wash hands again, put gloves back on. For more information see https://www.hse.gov.uk/skin/employ/gloves.htm.
Employees should be made aware of the limitations of glove use, such as touching their faces while wearing gloves which may be contaminated, and that gloves are no substitute for good hygiene and hand washing. Gloves should already be in use for non-COVID-19 reasons in many waste management activities, and this should continue. In the case of reducing the risk of transmission, gloves should:

- Be impermeable/waterproof
- Or, supported by use of impermeable gloves used underneath 'standard' gloves

Employees must be provided with an adequate supply of gloves and instructed to change gloves at a frequency appropriate to the type of glove and its use, and that glove use does not mean that good hygiene and hand washing are not required. For further details on disposable glove selection and use see https://www.hse.gov.uk/skin/employ/latex-gloves.htm.

Masks/RPE (respiratory protective equipment) and face-coverings

One item of PPE which has been the subject of much publicity is the use of face masks/RPE, and the use of the term 'face-coverings' has become common (see information at: https://www.hse.gov.uk/coronavirus/ppe-face-masks/non-healthcare/index.htm and https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own and discussion in appendix 1 below).

Definitions – for the purposes of this document:

The term *face-covering* includes homemade coverings, snoods and scarves and various other similar items of face-covering available from on-line and other suppliers. Their common feature is that they are not manufactured to any formal standard, such as an EN standard, and do not have any formal protection rating applied to them, such as an FFP rating. There is no duty on employers to provide face coverings, although they may choose to do so.

Face masks/RPE are manufactured to formal standards, such as EN or equivalent standards, and often have a protection rating applied to them, such as FFP3. Masks/RPE range from surgical masks to air-fed hoods and orinasal masks. Where a risk assessment indicates there is the need for RPE employers are under a duty to provide it without charge.

Note – the use of a transparent plastic or similar face shield/visor has become popular for some people. The evidence is that such shields/visors provide little protection and should not be used on their own. See information at https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own, which includes the statement: "*A face visor or shield may be worn in addition to a face covering but not instead of one. This is because face visors or shields do not adequately cover the nose and mouth*".

Face masks/RPE are workplace items and come with employer duties, such as on provision, cleaning, replacement, fit-testing etc. Face-coverings are not and do not attract employer duties, although employers need to be aware of their use. Employers may also need to be careful as this is an area where public and workplace health issues may cross-over. Advice from the HSE on the topic of masks and face-coverings is available at: https://www.hse.gov.uk/coronavirus/ppe-face-masks/face-coverings-and-face-masks.htm

Regarding *RPE/face masks*, the need for RPE (respiratory protection equipment) to protect from coronavirus must be based on risk assessment. For example, current guidance states that healthcare workers undertaking high risk aerosol generating procedures on COVID-19 patients are required to wear FFP3 respirators, whereas those simply looking after patients with COVID-19 wear fluid repellent surgical masks. Waste industry workers are unlikely to encounter the same level of risk. However, where a risk assessment has previously indicated that an employee would be expected to wear respiratory protection for non-COVID-19 reasons as part of their normal job, then they should continue to do so.

HM Government advice states: "'*Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings*…".

Prolonged use of RPE/face masks may also have problems. For example, wearers may be tempted to adjust the fit frequently risking hand to face contact, masks may become moist so trapping contaminants, germs and similar, and prolonged use may result in dermatological and other conditions. Experience and research indicate that the prolonged use of RPE is unlikely to be effective as a control and may introduce additional risks.

In addition, the cleaning of hands and removal of gloves before putting-on and taking-off RPE/masks (and face-coverings) is essential to avoid the potential transfer of contamination from hand/glove to RPE/covering, where it can be inhaled. Likewise, if RPE/coverings are left on contaminated surfaces, stored in pockets, or similar there will be potentially increased risk of the RPE/face covering becoming contaminated and that contamination then coming into prolonged contact with the skin or being inhaled. Working in waste management is not the same as working in a retail outlet. RPE (and face-covering) use is likely to require more rigorous hygiene standards to be effective. These need to be enforced, and more frequent replacement and/or cleaning of RPE is likely to be necessary.

As a result of the requirements above and the difficulties there may be in meeting them in, for example, waste and recycling collection settings, there is a potentially higher risk of failure of the RPE/face covering to control the risk. In addition, transference of the virus by hand and/or contaminated surfaces may also be a risk, though it is now thought that inhalation of airborne droplets/small particles is the primary route. As a result, waste management employers need to take these issues into account and should be wary of transferring practice from other sectors which may not have such potentially high hygiene and contamination issues.

Notwithstanding the above and current government workplace advice, where an organisation does decide to issue RPE/face masks for reasons such as employee reassurance:

- Their risk assessment should include the risk of employees placing overreliance on RPE to the detriment of other more effective controls such as good hygiene and Social Distancing, and what will be done to reduce this risk
- Their assessment should also include a clear description of the reasons, including employee reassurance, why RPE is to be used and its limits in use
- Limit use of RPE to short periods and only in specific situations were adequate Social Distancing may not be reasonably practicable (experience and research indicates that prolonged use of RPE is ineffective as a control)
- Instruction of employees in the use, storage, replacement, and disposal of RPE, the limitations of RPE as a precaution and the risks associated with overreliance on RPE to the detriment of other more effective precautions

Where an employer decides to provide RPE/masks for reasons of reassurance, rather than for personal protective reasons, employers may want to make this clear to their employees.

For more information see https://www.hse.gov.uk/respiratory-protective-equipment/types-rpe.htm and https://www.hse.gov.uk/coronavirus/ppe-face-masks/index.htm.

Note – while the situation has improved since the early stages of the pandemic, some organisations are still reporting shortages of specific types of RPE, and shortages may occur again in the future. Where alternative types and standards of RPE are being considered to address shortages employers should ensure the level of protection provided remains adequate. Employers should also be wary if offered alternatives and standards they are unfamiliar with. For example, the US 'N' standard for masks. Such alternatives may be acceptable, but if in doubt competent advice should be sought.

Regarding *face-coverings*, few can have failed to notice their increased use, such as in public places, and their use has been mandated in some public internal spaces such as shops, other retail premises, cinemas etc. It is not the purpose of this document to comment on non-workplace issues.

However, it is accepted that employees may attend work wearing their own face-coverings. This issue is also included in the HM Government workplace advice documents, which state (also see note above on public health in the devolved nations):

"Employers should support their workers in using face coverings safely if they choose to wear one. This means telling workers:

- *Wash your hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and after removing it*
- *When wearing a face covering, avoid touching your face or face covering, as you could contaminate them with germs from your hands*
- *Change your face covering if it becomes damp or if you've touched it*
- *Continue to wash your hands regularly*
- *Change and wash your face covering daily*
- *If the material is washable, wash in line with manufacturer's instructions. If it's not washable, dispose of it carefully in your usual waste*
- *Practice social distancing wherever possible"*

In addition, waste collection, and other waste related activities, may require operatives and other personnel to enter internal spaces where face-coverings have been mandated by law, such as retail premises. If practical and safe, consideration may be given to changing the collection methodology so that entry is not required. However, if this is not practical and/or safe, then collections operatives must obey the law.

Tip – some employees may go beyond face-coverings and come to work wearing formal RPE they have purchased themselves. In these cases, employers may wish to communicate to them that such RPE should not be relied on for protection, neither for wearer nor their workmates, and that the normal employer duties for RPE do not apply. Consideration may also need to be given to interface issues, such as a face mask impairing vision for drivers.

Comment – regards the disposal of used PPE. For used PPE from the healthcare and similar sectors guidance is already in place. For used PPE from other sectors, including waste management, and from the public, PPE should be disposed of into residual waste streams. Most PPE is not recyclable and can reduce the quality of recycling waste streams. Further advice is available at: https://www.gov.uk/guidance/coronavirus-covid-19-disposing-of-waste

Note – to assist employers in their decision-making process, appendix 1 of this information sheet outlines the pros-and-cons of face masks and coverings. This appendix is intended as discourse only and is not a formal part of this information sheet.

Note – some waste management activities require employees to go onto third party sites, including going into buildings in some cases. These third parties may have imposed their own mask/face-covering rules. As with other customer and similar rules, these should be obeyed by the waste management employee/s involved. Conversely, if a waste management employee on a third-party site feels that the COVID-19 controls in place are inadequate they should report this to their employer, and they should be supported by their employer if they decide not to do the job because of their concerns.

Vulnerable and clinically extremely vulnerable persons

Persons with pre-existing conditions, or other individual factors, may be more prone to suffering more serious effects from COVID-19. Current guidance uses two categories - 'vulnerable' and 'clinically extremely vulnerable' persons. In outline, vulnerable persons may be more prone to the effects of COVID-19 because of factors such as their age, being overweight etc. Clinically extremely vulnerable persons include those with specific clinical conditions which may make the effects of COVID-19 extremely serious.

For advice on vulnerable persons see: [Protect vulnerable workers - Working safely during the coronavirus (COVID-19) pandemic (hse.gov.uk)](). However, and in general, employers should protect all of their employees, vulnerable or not, the precautions which may need to be put in place are typically the same, and strict adherence by employees to controls should be the same no matter their status.

For advice on clinically extremely vulnerable persons see:
[https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19#work-and-employment-for-those-who-are-shielding]() and [https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19](). In particular, employers should note any requirement for clinically extremely vulnerable persons to 'shield' (self-isolate) in specific circumstances, such as in England dependent on the 'tier' they live in, or if a lockdown is in effect, or if they have been contacted and instructed to shield.

As restrictions change and/or lift, employers should consider carefully how, when and under what conditions they seek to reintegrate clinically extremely vulnerable persons back into the workplace.

Testing for COVID-19 and the NHS 'test and trace' scheme

Testing is available for those showing the symptoms of COVID-19, or if another member of their household is showing symptoms, and in some areas mass testing, whether a person is showing symptoms or not, is available. Testing can be via a regional drive-through test site or by home-test kit. See as appropriate: https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested or https://gov.wales/coronavirus-covid-19-testing-process or https://www.gov.scot/publications/coronavirus-covid-19-getting-tested/ for information. Where testing is for persons with symptoms, or family members with symptoms (or other specific circumstances), they should already be self-isolating and not at work. Please note that the outcomes of testing may not be straightforward. See: https://www.nhs.uk/conditions/coronavirus-covid-19/testing-for-coronavirus/what-your-coronavirus-test-result-means/.

The NHS in England has introduced a 'test and trace' scheme. Guidance for employers on the scheme is available at: https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance. Equivalent schemes are also in place for Scotland (see: https://www.nhsinform.scot/campaigns/test-and-protect) and Wales (see: https://gov.wales/test-trace-protect-guidance-employers). The aim of this scheme is to allow rapid communication with the 'contacts' of an infected person so that they can be instructed to self-isolate to reduce the risk of transmission of the disease.

If an employee is contacted and instructed to self-isolate, they must do so, and their employer should co-operate in this. However, just because an employee has tested positive for COVID-19 does not automatically mean that the whole of a workforce needs to cease work and self-isolate, although those who have been in close contact, such as sharing a vehicle cab, may need to do so. If in any doubt, employers should contact NHS test and trace (or the Scottish or Welsh equivalents) and seek advice.

First aid provision

First aiders may, by the nature of what they do, may come into close contact with persons they are treating. Specific information is available at: https://www.gov.uk/government/publications/novel-coronavirus-2019-ncov-interim-guidance-for-first-responders/interim-guidance-for-first-responders-and-others-in-close-contact-with-symptomatic-people-with-potential-2019-ncov, and from the St John's Ambulance web site at: https://www.sja.org.uk/get-advice/first-aid-advice/covid-19-advice-for-first-aiders/. Please also see HSE advice at: https://www.hse.gov.uk/coronavirus/first-aid-and-medicals/first-aid-certificate-coronavirus.htm.

4. Changes in response to COVID-19

Changes from previous version: There are no significant changes to this section.

> **Note** – this section was originally written in April 2020 during the initial phases of the pandemic. It was subsequently updated in May 2020 to give guidance on the resumption of services which had been temporarily suspended. Most services have now resumed, and most employers have achieved or are achieving their 'new normal', including the impact of the various 'tier' type systems and periodic lockdowns. As a result, this section may be considered redundant. However, it has been left in place as a reference for employers and to inform in the event of further lockdowns (or similar restrictions) which may result in a need to suspend some services again. It may also be used to inform employer monitoring aimed at ensuring that controls for COVID-19 remain robust.

Maintaining critical competencies and standards

Waste operations operate under strict standards of safety and competency. Any contingency and similar measures taken regarding COVID-19 must not compromise these.

Health and safety requirements, such as plant operator licences, permits to work, machinery lock off and isolation etc. **MUST NOT** be compromised: COVID-19 is not an excuse to reduce safety or training requirements. For example, reducing crew size in household collections to the point that safe reversing procedures cannot be followed.

Environmental permit/licence and other legal requirements must be maintained even during any widespread or local COVID-19 outbreak. If you plan to take any contingency or similar action, which may affect your permit/licence or have an environmental impact, you should contact your environmental regulator first, and you would be advised to keep up to date on any announcements, temporary regulatory position statements and similar from your regulator relating to COVID-19.

Change management

In response to COVID-19 many organisations have made changes to the way they operate. Health and safety should be a core consideration when considering such changes to avoid unintended consequences. For example, temporarily closing CA/HWRC sites may remove the risk of transmission at such sites but may also result in an increased demand for bulky waste collections, which may be simply moving a problem from one place to another.

Waste Industry Safety and Health Forum

Any modification to work equipment, including vehicles and machinery, in response to COVID-19 must be considered very carefully to avoid compromising other safety features, emergency escape and similar. Good change management is critical with any modification of work equipment.

Some employers have installed, or are considering installing, Perspex or similar 'screens' in workplaces and/or vehicle cabs, similar to those installed in some supermarkets at check-outs or those in place for security reasons in buses or other public transport vehicles.

Dependent on their design and placement, screens may reduce, to an extent, the risk from projected particles/airborne droplets, such as produced when someone coughs, but there is little evidence currently that they are effective in preventing the spread of viruses. Notwithstanding the above where an organisation does decide to install screens:

- A design change risk assessment should be performed to ensure that safety arrangements and features, such as emergency escape, machinery safety provisions and fixed and other fire systems, are not adversely affected by the installation
- The assessment to include the risk of employees placing overreliance on screens to the detriment of other more effective controls such as hygiene and Social Distancing, resulting in a higher risk of transmission, and what will be done to reduce this risk
- The risk assessment should also include a clear description of the reasons why screens are to be installed and their limitations
- Instruction should be given to employees on the limitations of screens and the risks associated with overreliance on screens to the detriment of more effective precautions
- Screens should be subject to the same cleaning regimes as other equipment

Please also see specific mentions of screens below under the sections on vehicles and collections operations and MRFs and recycling plants.

Changes to ways of working, PPE use etc as a result of COVID-19 may need to be put in place quickly. However, changes still need to be considered carefully to ensure any health and safety consequences are assessed, including as appropriate whether they meet the test of being 'reasonably practicable' (see: https://www.hse.gov.uk/risk/theory/alarpglance.htm). Likewise, relevant parties should still be involved when making decisions:

- Consult with employees on changes. They may have a different perspective and may also have knowledge and experience not held by management
- If a change involves third parties, such as customers/clients, consult with them

- For some changes, the involvement of specialists or external competent persons may be required or advised

> **Tip** – decisions and changes made quickly may not be recorded with normal rigour. Organisations may be wise not to forget this aspect and ensure they record their decision-making process, risk assessments and similar which led to any change and the detail of the change, including the involvement of third parties, employee representatives and similar.

Staff shortages and changes to ways of working may result in longer working hours. Employees may also, understandably, have concerns about their work and COVID-19 risk (whether these concerns are well founded or not they may be very real to the employee). In addition, changes to services, such as HWRC/CA site operation and collections, may result in adverse responses from members of the public and others.

- Employers should monitor working hours to ensure that safety standards are not degraded, and be aware of the risks associated with fatigue (see: https://www.hse.gov.uk/humanfactors/topics/fatigue.htm and https://www.hse.gov.uk/humanfactors/topics/specific2.pdf for further advice)
- Employers should consider the mental health and wellbeing of their workers. This may not be directly work related, but employers may want to make information available such as at: https://www.nhs.uk/oneyou/every-mind-matters/?WT.tsrc=Search&WT.mc_id=Brand&gclid=EAIaIQobChMI6qHAmoz86AIVhOF3Ch1ENg7uEAAYASAAEgKNi_D_BwE. Resources are also available at: https://campaignresources.phe.gov.uk/resources/campaigns/82-every-mind-matters/resources
- Changes to services may result in adverse reaction from the public, including aggressive and violent behaviour. Such changes may relate to restrictions on entry and use at HWRC and similar sites, changes in collection routes as the result of increases or changes in waste arisings and other issues. As relevant, workers should be informed that all such must be reported and that in serious cases the police should be called. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate

Inspections, testing, maintenance, and repairs

Concerns relating to the examination of equipment, such as under the Lifting Operations and Lifting Equipment Regulations (LOLER) have been raised (see: https://www.hse.gov.uk/coronavirus/equipment-and-machinery/work-equipment.htm). Inspections of equipment should continue to be done and can be done safely. Tests, inspections, daily/weekly and similar checks, critical maintenance and similar must be maintained, unless legal derogations are put in place dictating otherwise.

Engineers who are working on sites where there are restrictions arising from the risk of COVID-19 infection should comply with site rules and advice regarding good hygiene practices and separation distances. Consideration needs to be given to protecting engineers but also, where relevant, any vulnerable persons who may be affected by their work. Such measures should already be in place at waste management operations and include for example the cleaning-down of equipment, mobile plant and vehicles before any maintenance and repair, and the use of appropriate PPE during such activities.

Returning to 'business as usual'

COVID-19 responses can include various changes to waste management services, perhaps most commonly the suspension of green and bulky waste collections and the temporary closure of HWRC/CA sites. Whatever the changes made, resumption of services needs careful consideration and planning. Waste management operators, and their clients, should plan for the resumption of services and returning to 'business as usual', or at least more normal services. How and when services return to normal, or closer to normal, may in some circumstances depend on national policy. The detail of such policy may vary between England, Scotland and Wales and by local authority. Operators should check that they are following the policy relevant to the location of their operations.

Where waste collection services, such as green and bulky waste collections, have been suspended, there may be a backlog of waste waiting for resumption of service. Waste management operators, and as applicable their clients, may want to consider:

- Phased resumption, such as not resuming all services at the same time
- Any additional resources required to tackle any backlog
- Communication with the public regarding the resumption of services, how this will be handled and any restrictions which will be in place
- For commercial waste collections, close communication with customers and clients to ensure that as they reopen services can be resumed in an orderly and safe manner

Waste Industry Safety and Health Forum

Where HWRC/CA sites have been temporarily closed their reopening needs to be planned carefully. In addition, during an ongoing pandemic where 'threat-levels' may rise and fall the general controls noted below may still be valid. Waste management operators, and their clients, may want to consider:

- Phased opening rather than opening all sites at once or partial opening, such as only accepting specific types of waste in the short-term. For example, only accepting green and bulky wastes or supplementing reopening with enhanced green waste or bulky waste collection services for the first few weeks
- Use of pre-booked time slots for members of the public rather than allowing everyone to simply turn-up at the HWRC/CA site
- Restricting access, such as by post code or 'odd/even' car registrations on different days to allow phasing of initial demand
- Restrictions on the number of cars allowed into a site at the same time, and using a 'one-in-one-out' approach when safe capacity is reached
- Queuing capacity, both on and off site, and how this will be managed. And, for off-site queuing advance communication and discussion with the local police force, and consideration of any police resource requirements
- Closing-off alternate car parking spaces to aid Social Distancing
- Reduced or extended hours of opening dependent on specific situations
- Use of floor markings (tape or paint) to reinforce Social Distancing
- Additional resources which may be required to manage any backlog
- Communication with the public regarding the resumption of services, how this will be handled, any restrictions on services which will be in place and similar
- External support which may be required, such as from the police, to manage the safe and orderly reopening of HWRC/CA sites, and communication and planning with such external resources before sites are reopened

See also section 5 on HWRC/CA site operation. Further guidance is also available at: https://www.gov.uk/government/publications/coronavirus-covid-19-advice-to-local-authorities-on-prioritising-waste-collections/managing-household-waste-and-recycling-centres-hwrcs-in-england-during-the-coronavirus-covid-19-pandemic, https://1ur6751k3lsj3droh41tcsra-wpengine.netdna-ssl.com/wp-content/uploads/2020/05/4-April-2020-NAWDO-HWRC-reopening-guidance-FINAL.pdf and/or https://www.gov.scot/publications/coronavirus-covid-19-reopening-and-managing-household-waste-recycling-centres/.

Some waste management operations, such as commercial waste collections, involve employees going onto third party company sites, such as customer sites. These third parties may have introduced additional controls or made changes to their ways of working in response to COVID-19. Operators should check before recommencing service. As has always been the case there is a duty on employers to communicate and co-operate on health and safety matters, and this would include on changes made in response to COVID-19.

The suspension of various waste management services in response to COVID-19 is often quick and sudden. The safe resumption of services is often more complicated and time consuming and requires careful thought and planning.

5. Specific advice

Changes from previous version: Significant changes to this section include link updates, reinforcement of the role ventilation has in controlling transmission, sundry updates, and a brief mention of current known incidence of COVID-19 in the waste management industry.

Note – much of the advice and information given below, and in sections 3 and 4 in this document, was written in April and May 2020 during the initial 'lockdown' in response to COVID-19. Many organisations have already returned to more normal business and service. However, such resumptions may need to be reversed in the event of any 'spike' in infection rates or during any periodic 'lockdowns' as the result of outbreaks or rises in infection levels. The processes, advice and information below would still need to be followed in the event of any such reversal of normal business and service. In addition, until circumstances and risk profile alter significantly, the maintenance of COVID-19 precautions is required, and practicing good hygiene will always be a requirement for waste management operations.

Below is advice for specific operational types and functions. You should assess your own specific operations using the below, and reasonable practicability, as a starting point.

Government has released various workplace advice documents. While none are specific to waste, they contain advice which, as appropriate, can be applied. For example, the Government document on offices is relevant to offices on waste sites, the document on construction may contain advice useful to sites which operate outdoors such as landfill and HWRC/CA sites. See: https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19. For devolved administrations also see: https://www.gov.scot/collections/coronavirus-covid-19-guidance/ or https://www.gov.scot/publications/coronavirus-covid-19-social-distancing-in-non-healthcare-public-services/pages/implementing-social-distancing-in-the-workplace/ or https://gov.wales/coronavirus-covid-19-guidance-prioritisation-waste-and-recycling-collection-services.

Routine inspections and monitoring

Employers carry-out routine 'safety inspections' to check that required standards are being met. This may be through regular workplace/site 'safety tours' or monitoring of standards during waste collections. Where changes have been made as a result of COVID-19, such as requiring Social Distancing during work, these should be incorporated into inspection and monitoring regimes. Putting in place an additional control aimed at COVID-19 is only part of the equation, checking to ensure controls occur is also required.

Monitoring precautions against COVID-19 is important. However, employers also need to ensure that monitoring for compliance with precautions aimed at other risks is also continued and not degraded. For example, monitoring for good traffic safety performance, such as to reduce the risk employees being so concentrated on Social Distancing that they step unaware into traffic (on or off site) to avoid breaching distancing. Or employees being so concentrated on COVID-19 precautions that lapses in lock-off, work at height and other critical precautions occur.

Tip – WISH has produced a reference document (WISH REF 07 example COVID-19 checklists – available on the WISH web site). While the checklists provided in this reference document are only examples and need customising and adding to take account of an employer's specific circumstances, they may be useful to inform your monitoring. See: https://wishforum.org.uk/ under resources and reference documents.

Street cleansing, public waste bins and fly-tipping

Litter and the contents of litter bins can include drug paraphernalia and may have been frequented by rodents. Clearing fly-tipped wastes, or looking for enforcement evidence in such wastes, may result in potential exposure to a variety of hazards, dependent on the nature of the wastes fly-tipped. Precautions and procedures should already be in place to ensure that persons collecting/clearing/inspecting such materials are suitably protected from harmful substances, biological agents and similar.

Litter and the contents of litter bins, including gloves, masks etc discarded by the public, can be collected, and bagged using normal precautions and procedures. Fly-tipped wastes should be approached as before through assessment of the wastes before clearing or inspecting such wastes and implementing controls appropriate to the hazards posed. In both these cases, if adequate precautions are already being taken, additional controls should not be required related to COVID-19.

Vehicles and collections operations

Obeying Social Distancing may be not be reasonably practicable for personnel who work together in the cabs of some waste collection vehicles. However, as an essential service it is important collection operations continue. What is reasonably practicable will depend on the specific circumstances of each collection methodology and type and each collection area. When deciding upon the measures to take consideration should be given to the following.

Waste Industry Safety and Health Forum

> **Note** – the advice below applies to both household and commercial/industrial waste collection services. In some cases, such as any need for shared lorry cabs, the issues faced may be more exacerbated for household compared to commercial/industrial collections, but the principles are the same.

- Can the collection be suspended, or reduced? For commercial waste collections many customers may be closed or running at reduced capacity – collections from such customers could be suspended, or the frequency reduced. For household collections it may be worth considering suspending some types of collection, such as green waste and bulky waste (but see above on change management)
- If reasonably practicable, use single-person operation. For many commercial waste collections this is already the case, and for others it may be practical to reduce twin-person operation to single-person, provided that safety is not compromised. Other than in limited cases, for household collections single-person collection operation is very unlikely to be reasonably practicable or safe, in which case please see below

Having considered the above, the below applies to **ALL** collection activities, and in addition to the general precautions given above:

- Cabs should have available alcohol- or soap-based cleansing and/or wipes available for all surfaces which should be cleaned periodically throughout the day and especially at the end of each shift. Cleaning should pay particular attention to door handles, hand holds/rails, dashboards, steering wheels, hand-brake levers, gearbox and other controls and indicator stalks etc. Do not forget external touch-surfaces such as lifting equipment and compaction control buttons and levers
- Where fitted, 'pop-up' sinks on waste collection vehicles should be subject to the same rigorous cleaning regimes as for any other welfare facility. Where pop-up sinks are fitted, disposable paper towels or similar should be available to dry hands
- Where a vehicle may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the vehicle should either be decontaminated thoroughly (see advice at https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings or https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/) or, if this is not reasonably practicable parked up and not used for a minimum of 72 hours

- Collections operations may result in contact with members of the public/customers. Social Distancing should be followed (at least 2 metres/>6 feet). Should this prove impossible, such as a member of the public not being willing to 'stand away from their bin' the waste should not be collected. In extreme cases members of the public may display aggressive and potentially violent behaviour. All such cases must be reported, and operatives informed to contact the police immediately if they are threatened. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate

- Safety precautions which would normally be taken, such as the use of respiratory protection during the collection of waste which is particularly dusty or might shed significant fibres must be maintained

- Normal monitoring processes to check crews are following good standards of safety should be continued, and the scope of monitoring extended to include maintenance of Social Distancing and enhanced concentration on hygiene practices and glove-use

- Normal precautions aimed at reducing the risk of 'sleepers in bins' and hazardous items in waste streams, such as gas cylinders, should be maintained

Note – as the public health derogations relating to the 2-metre Social Distancing rule, provided other controls are in place to reduce risk, become embedded in the public mind, it is possible that members of the public and commercial waste customers may not apply Social Distancing as rigorously as they did previously. This may lead to members of the public and customers seeking to approach collection operatives more closely. Employers may wish to make their employees aware of this potential risk.

If single-person collection operation has been assessed as not being reasonably practicable, as is likely for most household waste/RCV (refuse collection vehicle) activities, or is likely to be unsafe, then in addition to the above and the general precautions given in this document:

- Consideration should be given to reducing the number of persons who share cab space. In some areas it might be possible for crews to travel independently to an area or estate and work as a group to fill RCVs that are sent with individual drivers and which go off to tip sequentially as they are filled and return. It is recognised, however, that there will be cases where such alternative methodologies cannot reasonably practicably be used. Where this is the case the primary control method is to maintain high standards of hygiene. During their considerations, employers should challenge themselves robustly to ensure that they really have reduced cab sharing requirements so far as is reasonably practicable

- Having considered the above, where reasonably practicable, time spent in shared cabs should be minimised.
- Where alternative methods either of transporting employees to collection points, or collection, is used organisations **MUST** take suitable and sufficient measures to ensure that employees still have access to a sufficient supply of soap and water, alcohol-based sprays or wipes and other materials for them to be able to maintain a high standard of hygiene and that collection operatives maintain Social Distancing during actual collection of wastes
- Where minibuses and similar are used to ferry employees to collection areas they should be subject to the same cleaning processes as given above for lorry cabs
- Where practical maintain consistent crew rosters (same crew in each team every day) and minimise close interactions between crews. It is recognised that absence, practicalities, crew competency requirements and other factors may limit the extent to which this is possible
- If safe to do so, crews may be dropped-off outside waste management sites so that only the driver proceeds to tipping areas before picking the crew up on the way out
- Open cab windows to encourage airflow – there is firm evidence to suggest that good ventilation is a critical control in situations such as shared cabs

Note – waste collections and locations vary widely. For example, the size of vehicle (and often therefore cab) used in a medieval town centre will likely be smaller than used in a suburban area. Likewise, the number of crew need to safely transport the waste to the vehicle may vary dependent on local circumstances and waste collection methodology. As a result, no fixed minimum or maximum number for cab occupancy can be given. However, in all cases, the aim should be to reduce the numbers sharing cabs so far as is reasonably practicable, and once this has been achieved implement other controls to reduce any remaining risk to as low as is reasonably practicable.

Where multiple-person crews are being used and lorry cabs are being shared, if a member of a crew develops the symptoms of COVID-19, or they contact their manager/supervisor to state that they have developed symptoms (in addition see section 3 above of the NHS 'test and trace' scheme):

- The cab must be decontaminated (see link above) or the vehicle parked-up for at least 72 hours. If a crew member develops symptoms partway through the working day, this must be done immediately even if it means aborting the collections round
- The crew member showing symptoms must be sent home immediately and instructed to apply for a COVID-19 test

- All crew members **MUST** immediately wash their hands thoroughly
- If at all reasonably practicable the remaining crew should not be allocated to a different crew, nor should a crew member from a different crew be allocated to fill the gap left by the person who has developed symptoms, unless they can travel separately and maintain Social Distancing when working. The time period for this type restriction, seven, 10 days or longer, will depend on the situation. The principles in the links given above in section 3 under test and trace may assist in informing employers regards an appropriate time period for restrictions. See also devolved administration advice such as https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/pages/advice-for-employers/ and as given in section 6
- Reinforcement instruction on precautions such as maintaining good hygiene should be conducted for all crews

If the above hierarchy of considerations is followed, required measures taken, and good hygiene practices enforced, the residual risks to employees will be minimised and will be low.

Some organisations have fitted, or are considering fitting, Perspex, or similar screens in vehicle cabs (see section above under change management). Specific to cabs (and other vehicles such as crew minibuses), and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- The material used should be appropriate to reduce risks such as the screen shattering in the event of a road traffic collision producing shards which may cause injury
- The blocking of or impeded access to safety critical controls
- Distortion of driver vision resulting from an installed screen
- Screens should be subject to the same cleaning regime as the rest of the cab
- Emergency escape from the cab
- Advice should be sought from the vehicle manufacturer/supplier or a suitably qualified and experienced vehicle engineer to ensure critical safety aspects are not compromised

Note – the above are not 'either/or' choices. For example, a household collection service may normally involve a driver and three crew. It may be decided that reducing to driver only with crew members being 'shuttled' to and from collection areas is not reasonably practicable. This does not mean automatically that nothing should change – for example, can the number sharing a cab be reduced to the driver and one, or two, crew members?

> **Discussion** – WISH receives information from various private and public sources. While these do not cover 100% of the industry, such information does provide a good 'snap-shot' and likely represent as good a view of the industry as any. To date, while individual cases and some likely non-work-related outbreaks at waste sites, have been recorded, WISH is not aware of any definite work-related outbreak of COVID-19 in the industry, including in waste collections involving shared cabs. This is not to say that the risk does not exist, and operators should maintain and enforce controls such as hygiene and ventilation, such as always keeping windows open in shared cabs.

Bulky waste collections

Concerns have been raised about the risks associated with the collection of soft furnishings, mattresses, and similar items as part of bulky waste collections.

Such items have the potential to be contaminated with a wide range of insects, parasites, and potentially harmful organisms many of which survive longer in the environment than coronaviruses. Existing risk assessments for the collection and handling of such items should have considered this potential and identified controls. This might include wearing gloves and other protective equipment. Plus, instructions that where such bulky waste items are dusty or shedding large numbers of fibres precautions should be taken which might include the damping of the waste with water or a disinfectant and/or the wearing of suitable RPE (respiratory protection).

Mobile plant

In addition to the above general measures:

- Cabs should have available alcohol- or soap-based cleansing spray and/or wipes available for all surfaces which should be cleaned periodically throughout the day and especially at the end of each shift. Door handles, hand holds/rails, dashboards, steering wheels, controls etc should be paid particular attention to
- Where an item of plant may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the plant should either be decontaminated thoroughly (see advice as above) or if this is not reasonably practicable parked up for a minimum of 72 hours
- If reasonably practicable, plant operators should be dedicated to one item of plant, or at least the number of operators using an individual item of mobile plant should be limited. The cab should be cleaned before the item of mobile plant is given to a different user to operate

> **Comment** – there have been news stories regarding alcohol-based hand sanitiser catching fire in hot weather. The National Fire Chiefs Council has published information refuting these reports and confirming that there have been no such cases but advocating keeping bottles closed and out of direct sunlight. See: http://www.nationalfirechiefs.org.uk/News/debunking-the-myth-hand-sanitiser-in-cars-do-not-pose-a-fire-risk-

Transfer stations, MBT, EfW, AD, landfills and similar

In addition to the above general measures:

- Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face-to-face contact – stay in mobile plant where reasonably practicable, keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation (see section 3 on Social Distancing) etc

MRFs and recycling plants

In addition to the above general measures:

- Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face-to-face contact – keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation etc
- Picking cabins may be an issue because of their enclosed nature and proximity of pickers to each other – consider rearrangement of the work to allow every other waste chute to be used, staggered on each side of the picking belt, to maintain adequate Social Distancing of 2 metres (see section 3 on Social Distancing). If fewer people are picking from a line, slowing-down conveyor speed may need to be considered
- Access and egress from cabins may also need to be considered, such as operatives entering and leaving one-by-one to avoid the need for people to pass near each other (save for in emergency situations such as a fire where the normal rules will still apply)
- Glove use should be reinforced for those working in picking cabins (see section above on gloves for detail of glove use)

Some organisations have fitted, or are considering fitting, Perspex, or similar screens in picking cabins/lines (see section above under change management). Specific to picking cabins/lines, and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- Access to critical safety provisions must not be impeded or restricted by the installation of screens. For example, easy access to 'pull-wire' emergency stop cords
- Any modification to or change of location of critical machinery safety provisions must be carefully risk assessed before being carried-out to ensure that access to such provisions and their effectiveness is not compromised. For example, the relocation of a pull-wire emergency stop cord to a less easily accessible position to facilitate the installation of screens, or a change in the 'run' of such cords which may compromise their effective operation
- Emergency escape from the cabin/line
- Potential interference with any fixed fire systems such as sprinklers (where fitted)
- Ability and access to clean the screen/s (screens should be subject to the same cleaning regimes as other equipment)

Recycling plant workers undertaking sampling and testing duties, such as for quality control and regulatory reasons, should already be working under appropriate controls, including adequate PPE. These controls should be maintained, and risk assessments relating to such duties reviewed in the light of COVID-19 to ensure they remain appropriate.

Use of PPE (face masks and gloves) by the public is increasing. The vast majority of PPE is not recyclable and may compromise the quality of recycling waste streams. Used PPE should be disposed of into residual waste bins/bags by the public, but this may not always be the case. If recycling plant operators start observing significant amounts of used PPE appearing on picking lines and similar, they should discuss the issue with their client. Public communications and education campaigns and publicity may be required to encourage used PPE to be disposed of into residual waste streams.

CA/HWRC sites

CA/HWRC sites are places where members of the public may meet in numbers, and as a result during the initial stages of the pandemic many sites were closed (please also see above example under change management regards bulky wastes and in the same section on reopening of HWRC/CA sites). The vast majority are now open as an essential service. However, control still needs to be exercised, and in addition to the above general measures:

- Issue instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face-to-face contact – keep mobile plant windows closed, and if you must speak directly maintain at least 2m separation (see section 3 on Social Distancing) etc. The use of floor markings (tape or similar) or cones around containers may assist

- Issue instructions to cease assisting members of the public with wastes, keep Social Distance from members of the public to reduce the risk of transmission (note – most CA/HWRC sites are contracted to local authorities and contact should be made with the authority as regards such measures)
- Items such as handrails on access steps to containers and other frequently touched surfaces and items should be cleaned frequently

Please also see section 4 on changes and in particular the text on the reopening of HWRC/CA sites and at https://www.gov.uk/government/publications/coronavirus-covid-19-advice-to-local-authorities-on-prioritising-waste-collections/managing-household-waste-and-recycling-centres-hwrcs-in-england-during-the-coronavirus-covid-19-pandemic and/or https://www.gov.scot/publications/coronavirus-covid-19-reopening-and-managing-household-waste-recycling-centres/.

Welfare facilities

To reduce the opportunity for person-to-person transmission and maintain Social Distancing consideration should be given to staggering rest breaks. For example, people number could be limited. Where capacity is reached the facility should operate a "one in, one out" situation. Staff and supervisors should be given responsibility to police and control this.

A regime should be put in place to ensure that rest areas are thoroughly cleaned after rest breaks and other uses (for example morning brief and afternoon debrief sessions).

All surfaces, crockery, cutlery etc. should be thoroughly cleaned/washed after use and surfaces cleaned periodically throughout the day. Items such as doorknobs should not be forgotten. Hand washing to be promoted and actively encouraged, and provision of wipes, sanitisers, soap to be made. **HOT** running water is essential.

Where possible, windows in welfare facilities should be kept open to encourage a good flow or air and ventilation.

Smoking areas are often also social gathering points. Staggering rest periods will assist but maintaining 2m separation during smoke breaks is still required.

It is common for waste management sites to provide toilet and other welfare facilities to visiting drivers and collection crews. HSE has reiterated that all drivers must have access to welfare facilities in the premises they visit as part of their work. Preventing access is against the law; equally it is not the sensible thing to do. Those who already provide reasonable access to toilets and handwashing facilities should continue to do so, although measures such as providing alternative temporary facilities may be considered. With the latest advice for hands to be washed regularly, failure to allow access to welfare facilities may increase the risk of the COVID-19 infection spreading. Please note that the general precautions, hygiene, and Social Distancing apply equally to all on site including third parties.

Weighbridges

In addition to the general precautions listed above:

- Where reasonably practicable weighbridge windows facing drivers to be kept closed. You may as a possible option consider installing transparent shields, as at some supermarket check-outs, although these should not be relied on as the sole control being used (note – windows not facing drivers should be kept open where possible to encourage good ventilation)
- If paperwork needs to be exchanged, impermeable gloves to be used, along with frequent washing of hands by weighbridge staff
- Where temporary regulatory relaxations have been put in place and as a result no paperwork exchange or other contact with shared items such as single digital signature pads are required, glove use may be relaxed, although frequent hand washing will still need to be maintained as good hygiene practice
- If still in use, the frequent cleaning and disinfecting of shared items such as digital signature pads, pens, clipboards and similar

Note – various temporary regulatory statements relating 'duty of care' have been released by regulators. You are advised to keep up to date, and that you ensure you understand the requirements relevant to your operations. If in doubt, contact your environmental regulator.

6. Other information and links

General links

- https://111.nhs.uk/covid-19
- https://www.nhsinform.scot/self-help-guides/self-help-guide-coronavirus-covid-19
- https://www.nhsdirect.wales.nhs.uk/contactus/
- https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection
- https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19
- https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings
- https://www.ecdc.europa.eu/en/factsheet-health-professionals-coronaviruses

Links to devolved administration web sites

- https://www.hps.scot.nhs.uk/a-to-z-of-topics/covid-19/
- https://www.gov.scot/collections/coronavirus-covid-19-guidance/
- https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/
- https://www.gov.scot/coronavirus-covid-19/
- https://www.gov.scot/publications/coronavirus-covid-19-returning-to-work/
- https://phw.nhs.wales/topics/latest-information-on-novel-coronavirus-covid-19/
- https://gov.wales/taking-all-reasonable-measures-maintain-physical-distancing-workplace

RIDDOR reporting and COVID-19

The links below provide information on the reporting of COVID-19 and RIDDOR:

- https://www.hse.gov.uk/coronavirus/riddor/index.htm
- https://www.hse.gov.uk/coronavirus/riddor/riddor-reporting-further-guidance.htm#disease-law

Disclaimer and WISH

This information document has been prepared by health and safety practitioners to assist health and safety improvements in the waste management industry. It is endorsed by the WISH (Waste Industry Safety and Health) Forum. This information document is not formal guidance and represents good practice, which typically may go beyond the strict requirements of health and safety law.

Nothing in this information document constitutes legal or other professional advice and no warranty is given, nor liability accepted (to the fullest extent permitted under law) for any loss or damage suffered or incurred because of reliance on this document. WISH accepts no liability (to the fullest extent permitted under law) for any act or omission of any persons using this document.

This information document is not a substitute for duty holder and/or professional safety advisor's judgment, Notwithstanding the good practice in this document, duty holders are responsible for ascertaining the sufficiency and adequacy of their internal and independent procedures for verifying and evaluating their organisation's compliance with safety law.

The Waste Industry Safety and Health (WISH) Forum exists to communicate and consult with key stakeholders, including local and national government bodies, equipment manufacturers, trade associations, professional associations, and trade unions. The aim of WISH is to identify, devise and promote activities to improve industry health and safety performance.

Appendix 1. Discussion and pros-and-cons of masks and face-coverings

This appendix consists of commentary and discussion. It is not a formal part of this information sheet. The text provides 'thoughts' for waste managers. Table 1 gives a summary of the 'pros and cons' of face-coverings and masks. The aim of both is to assist employers when making their own decisions.

Regards face-coverings, their inclusion in the table below is for comparison purposes only and is not intended to imply that employers should provide such coverings for protection.

Regards RPE (respiratory protection)/face masks, HM Government advice states: "'*Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings*…". The inclusion of masks in the table below is not intended to imply that employers should provide them to protect against COVID-19 risks.

> **Note** – the use of a face shield/visor has become popular for some people. The evidence is that these provide little protection and should not be used on their own. See: https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own, which includes the statement: "*A face visor or shield may be worn in addition to a face covering but not instead of one. This is because face visors or shields do not adequately cover the nose and mouth*".

Whether RPE (respiratory protection) is required, or not, is a matter for risk assessment. The use of face-coverings is a personal choice, except where mandated by law. If, based on their assessment, an employer issues RPE they attract responsibilities for the standard of the RPE, its use, cleaning, replacement, fit-testing etc. Face-coverings are not produced to a formal standard, are not RPE, and employers should not issue face-coverings to their employees as protection. However, if an employee decides to wear their own face-covering, employers should support them in this.

The 'pros-and-cons' of coverings and masks for various issues, such as fit, comfort in use, effectiveness, hygiene and similar are included in table 1. For waste management activities, hygiene in use is of specific importance. By their very nature, many wastes are contaminated by hazardous substances and/or biological agents and such contamination may transfer to gloves, surfaces and similar. Waste management activities may be described as occurring in a 'dirty environment', no matter how good housekeeping and cleaning are. The cleaning of hands and removal of gloves before putting-on and taking-off RPE/masks and face-coverings is essential to avoid the potential transfer of contamination from hand/glove to RPE/covering, where it can be inhaled. Likewise, if RPE/coverings are left on contaminated surfaces, kept in pockets, or similar, the risks of the RPE/face covering becoming contaminated increases.

Working in waste management is not the same as working in a retail outlet or a bank. RPE and face-covering use is likely to require more rigorous hygiene standards. These need to be enforced, and more frequent replacement and/or cleaning is likely to be necessary. As a result of these requirements, and the difficulties there are in meeting them in waste and recycling collection settings, there is a potentially higher risk of failure of RPE/face covering to control the risk, or potentially even to increase risk. Waste management employers need to take this into account and should be wary of transferring practice from other sectors which may not have such potentially high hygiene issues.

There are other reasons why waste management employers may need to be wary of transferring practice and requirements from other sectors in a 'wholesale' manner. Taking the use of face-coverings in retail outlets and on public transport as an example:

In specific circumstances, face-coverings may provide a level of source control. If a person is asymptomatic, or has yet to develop symptoms, wearing a face-covering may reduce their broadcast emission of aerosols, to an extent. This may provide some level of protection for other persons they come into close contact with (note - if they are showing symptoms, they should be self-isolating and not in close contact with any other person in any situation). This may be of use in internal spaces where Social Distancing may be difficult to achieve, such as shops and trains etc, and where multiple people are present – the more people the higher the risk that one may be asymptomatic or not showing symptoms as yet. In external spaces, unless people are in prolonged very-close proximity such as a dense crowd, Social Distancing, and natural ventilation etc are likely to be more effective.

Considering the above, and from a workplace perspective, the use of face-coverings by members of the public in retail premises may help to protect shop workers who work indoors and can come into close proximity to 100s of different people a day, or transport workers likewise. Taxis may be another example. Face-coverings use by 'fares' could provide some degree of help in terms of protecting a taxi driver who may come into close proximity in their cab with dozens of different people a day.

Obviously, household waste collection is not a retail outlet, and the actual collection takes place outdoors where adequate social distancing between crew and members of the public can be maintained. The collection crew themselves are only exposed to other crew members and not multiple other people. In addition, the precautions listed in section 5 of this information note, such as reducing time spent in shared cabs and maintaining consistent crews, can reduce risk further. A weighbridge where multiple third parties need to enter a weighbridge office in which maintaining distancing may be problematic might be a different case. First other controls, such as modifying the office so that third parties do not need to enter or conducting any required business outside of the office need to be considered. If this is not reasonably practicable the use of face-coverings by these multiple third parties, in conjunction with good hygiene and other measures, may have a benefit, although this would be a matter for specific assessment by the employer.

The above are only examples and thoughts. The aim is to illustrate that waste management employers need to consider carefully what happens in other sectors. There may be lessons which can be learnt and transferred, but what works in one setting may not work in another and may potentially in some cases result in an increase in the level of risk. Employers have the duty to assess their own specific situations – the above, and table below, are not intended to be guidance but may assist.

Waste Industry Safety and Health Forum

Table. Pros-and-cons summary

Face-coverings (snoods, homemade and other masks, including surgical 'looking' masks, NOT manufactured to a formal standard)	Surgical masks (manufactured to the appropriate EN or similar formal standard)	Higher-protection RPE (FFP2/3 masks or equivalent manufactured to formal standards)
PROs		
May provide a level of source control (may provide limited protection for persons other than the wearer)	May provide a level of source control (may provide limited protection for persons other than the wearer)	Higher filtration level provides effective protection for wearer (provided fit-tested and used correctly)
Cheap, can be homemade and easily available online or from various retailers	Constructed to formal recognised, consistent standards	Made to recognised, consistent standards, including being subject to testing and quality regimes
Dependent on construction, can be fairly comfortable to wear for longer periods of time	Looser fitting and usually more comfortable to wear than higher-protection RPE	Proven performance in reduction of inhalation of bioaerosols including viruses when worn and fitted correctly
Some research indicates may improve behaviour in other areas such as hygiene and distancing	Some research indicates may improve behaviour in other areas such as hygiene and distancing	
CONs		
Do not protect the wearer effectively (see above – may be useful as a source control, which is a different matter)	Do not protect the wearer effectively from smaller sized aerosols (designed to protect from larger droplets)	If fitted with a one-way, unfiltered exhalation valve do not protect persons other than the wearer effectively
Typically, loose fitting resulting in gaps through which aerosols/virus can pass	Fairly loose fitting resulting in gaps through which aerosols/virus can pass	Relatively expensive, particularly in times of shortage
Inadequate filtration to provide significant protection to wearer and often worn incorrectly	Inadequate filtration to provide significant protection to wearer and often worn incorrectly	Require face-fitting and training to be effective
Much research over years indicates may result in wearers not following more effective controls such as hygiene and distancing	Much research over years indicates may result in wearers not following more effective controls such as hygiene and distancing	Tight fitting so prolonged use (>1 hour typically) can be uncomfortable. Very prolonged use of non-powered RPE can be harmful
Often worn incorrectly	Widespread use may result shortages in sectors which really need this level of protection, such as healthcare	Widespread use may result in shortages for those who need this level of protection, such as healthcare workers, those exposed to bio-aerosols in waste management etc
Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)	Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)	Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)
Some evidence aerosols can be trapped on/in face-covering and so be inhaled and re-inhaled	Disposal issues as generally worn once and discarded rather than cleaned	Misunderstanding over how many times such RPE can be re-used