RSA INSURANCE

COVID-19 guidelines for **phased return of small retail outlets**

Introduction

We understand that businesses may be struggling to manage the new set of risks which they find themselves facing. We have created this guide to help your clients and their employees protect themselves during this difficult time.

This guidance applies to:

- Small retail outlets with a small number of staff, on the basis that the retailer can control the number of individuals that staff and customers interact with at any one time.

- Open marts where social distancing can be maintained

In this guide you will find…

- Employer's duties

- Permit phased return guidelines

- Further information

- Employee safety briefing sign off

Permit phased return of small retail outlets

Guidelines for Employers

Under the Safety, Health and Welfare at Work (SHWW) Act, 2005, employers have specific duties to **ensure the safety, health and welfare at work of all employees**.

The primary obligation under the SHWW Act 2005 is for the employer to "ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees." Employers must be able to demonstrate that they have done all that was reasonably practicable and that to do more would have been grossly disproportionate to the risk.

While there is no expectation that employers will be able to guarantee that staff will not contract COVID-19, the 2005 Act requires employers to introduce specific health surveillance and protection measures in order to discharge their obligations.

For the permit phased return of:

- Small retail outlets with a small number of staff, on basis that the retailer can control the number of individuals that staff and customers interact with at any one time.

- Open marts where social distancing can be maintained

Employers should also be familiar with requirements set out in the Safety, Health and Welfare at Work (General Applications) Regulations 2007 (where applicable).

Employers **duties**

Key duties include:

- managing and conducting all work activities to ensure, as far as practical, the safety, health and welfare of employees

- providing safe systems of work that are planned, organised, and maintained

- assessing risks and implementing appropriate control measures

- providing safe equipment including personal protective equipment, where necessary

- providing employees with information, instruction, training and supervision in relation to safety and health

Return to Work Safely Protocol

COVID-19 Specific National Protocol for Employers and Workers

A **Return to Work Safely Protocol**, is the result of a collaborative effort by the Health and Safety Authority (HSA), the Health Services Executive (HSE) and the Department of Health which has been designed to support employers and workers to put measures in place that will prevent the spread of COVID-19 in the workplace. You can find the **Return to Work Safety Protocol** here: https://www.gov.ie/en/publication/22829a-return-to-work-safely-protocol/

This guideline document is not a substitute for the Return to Work Safety Protocol but has been prepared to provide general guidance on phased re-opening measures which should be taken to prevent the spread of COVID-19.

The HSA has been given the role of overseeing compliance with the Protocol and will respond to any complaints and carry out inspections.

Inspectors have the power to serve Improvement Notices or Prohibition Notices if they identify breaches. Employers who are in breach can leave themselves open to either being shut down and / or prosecuted.

Some **questions** to consider

As an employer you should think about the following:

- Has the work been adequately risk assessed in advance of returning to work?

- Are suitable arrangements in place?

- Can the work be done safely?

- Do you need to put control measures in place to further protect employees?

You should review / revise your approach as required.

COVID–19 Lead Worker Representative(s)

Employers should appoint at least one lead worker representative (LWR) who will work with them to ensure that the measures are implemented.

That person(s) must be fully briefed to oversee all matters related to managing the health and wellbeing of all employees.

Health Check
for Returning Employees

Have clinically vulnerable individuals, who are at higher risk of severe illness (for example, people with some pre-existing conditions), been helped to work from home, either in their current role or in an alternative role or asked to take extra care in observing social distancing?

Have you established and issued a pre-return to work form for workers to complete at least 3 days in advance of the return to work? A link to this form can be found in the Health and Safety Documentation section on the next page.

Has a COVID-19 response plan been developed/updated?

Are suitable arrangements in place for dealing with a suspected case of COVID-19 in the workplace?

Employers also need to put in place provisions to support workers' mental health and wellbeing. This is so important at all times, but even more so now.

Legionella

Where water has been lying stagnant in lines, burcos, kettles, hot water tanks, taps etc. since March, you now need to ensure that no person becomes unwell by consuming this water.

Legionella organism is naturally present in water but when it is allowed to grow and multiply it becomes a health concern. It's growth occurs when water lies stagnant and reaches temperatures over 20° C.

A risk assessment should be conducted identifying the risks in the workplace and the necessary control measures.

See below the HSA Document on Control of Legionella Bacteria.

https://www.hsa.ie/eng/topics/biological_agents/specific_biological_agents_infections/legionellosis/covid-19_legionella_information_note.pdf

Health and Safety
Documentation

Written procedures must be put in place for managing COVID-19 to ensure, in so far as is reasonably practicable, a safe place of work and safe use of equipment for all returning employees. This includes amending existing risk assessments to incorporate additional COVID-19 risk control measures, as well as the development and / or updating of a COVID-19 response plan.

The Health and Safety Authority (HSA) has published a number of checklists and templates which employers might find useful, please find below the list of guidelines and links to these templates.

Have these procedures been **communicated to all employees** in a form, manner and language that they understand?

HSA Templates

Return to Work Form	Word	PDF
COVID-19 Response Plan *(word version currently unavailable)*	PDF

Employer Checklists

Checklist 1: Planning and Preparing	Word	PDF
Checklist 2: Control Measures to Prevent Infection	Word	PDF
Checklist 3: COVID-19 Induction	Word	PDF
Checklist 4: Dealing with a Suspected Case of COVID-19	Word	PDF
Checklist 5: Cleaning and Disinfection	Word	PDF

Employee Checklist

Checklist 6: Workers	Word	PDF

Worker Representative(s) Checklist

Checklist 7: Worker Representative(s) Checklist	Word	PDF

Physical Distancing

In order to slow the transmission rate of COVID-19 a physical distancing of a minimum of 2 metres is recommended by the HSE.

Things to consider:

- Travel to/from work – where possible workers should travel to work alone. Where this is not possible they should sit as far apart as the vehicle allows and keep windows open for additional ventilation. They should avoid using public transport if possible. Where this is not possible take all necessary precautions to reduce the possibility of infection

- Ensure the workplace can allow for the recommended 2 metre separation in so far as is reasonably practicable – these include general places of work as well as welfare facilities such as canteens and toilets

Where physical distancing recommendation of 2 metres cannot be achieved, additional risk control measures must be implemented as required.

Examples include:

- Install physical barriers, such as clear plastic sneeze guards between workers

- Maintain at least a distance of 1 metre or as much distance as is reasonably practicable

- Minimise any direct worker contact and provide hand washing facilities, and other hand hygiene aids, such as hand sanitisers, wipes etc. that are readily accessible, so workers can perform hand hygiene as soon as the work task is complete

- Organise breaks in such a way as to facilitate maintenance of physical distancing during breaks in canteens, meeting points etc.

- Stagger employee arrival / departure times to reduce crowding going into and out of the workplace

- Provide one-way systems for access / egress routes in the workplace where practicable

- Limit the number of people in the building

Social Distancing
Keep at least 1 metre (3 feet)
ideally at least **2 metres** (6 feet) from one another

Social distancing floor graphics can be downloaded from
https://www.hsa.ie/eng/topics/covid-19/covid-19_coronavirus.html

Customer Facing Roles

Employers must:

- Eliminate physical interaction between workers and customers as much as is reasonably practicable through revised working arrangements. For example, through provision of online or phone orders, contactless delivery or managed entry

- Provide hand sanitisers at entry / exit points and encourage customers to use hand sanitiser as they enter the premises

- Encourage customers to avoid handling products whilst browsing if possible

- Install physical barriers and clear markings to ensure that contact between workers and customers is kept to a minimum and to ensure that queues do not form between customers as they wait to be served

- Implement a cleaning regime to ensure that contact points for workers and customers are kept visibly cleaned at all times

- Display the advice on the COVID-19 measures in visible locations to ensure that customers are also adhering to what is required

Public information posters can be downloaded from
https://www.hsa.ie/eng/topics/covid-19/covid-19_coronavirus.html

Hygiene

All employees should wash their hands well and often to avoid contamination – for a minimum of 20 seconds.

Other things to consider include:

- Ensure there is access to facilities to support hand hygiene (e.g. hand sanitiser / hand wipes / hand washing facilities)
- Display posters on how to wash hands in appropriate locations
- All surfaces should be regularly disinfected / cleaned
- Limit equipment usage to 1 person where possible – clean down touchpoints before and after use
- Try to avoid sharing of equipment – clean down touchpoints before and after use.
- Clean work areas at regular intervals. Further information on cleaning in non-healthcare settings is available from the ECDC at: https://www.ecdc.europa.eu/sites/default/files/documents/Environmental-persistence-of-SARS_CoV_2-virus-Options-for-cleaning2020-03-26_0.pdf
- Ensure all employees:
  - o practice correct coughing and sneezing etiquette
  - o Wash hands before and after eating, smoking or vaping, after toilet use etc.
  - o Dispose of used tissues correctly after use

PPE

Personal Protective Equipment (PPE) is any device or appliance designed to be worn or held by an individual for protection against one or more health and safety hazards. Examples of such include gloves, eye protection, high-visibility clothing and safety footwear.

Now more than ever PPE should be personal and not shared with any other person during the COVID-19 pandemic.

It is recommended that disposable gloves should not be worn in place of washing hands. Wearing disposable gloves can give a false sense of security and hands can become contaminated when gloves are taken off.

Face masks are also unlikely to be of any benefit if the wearer is not sick – the preferred approach is to ensure social distancing and good hygiene measures.

Further Information

Rialtas na hEireann
Government of Ireland
https://www.gov.ie/en/publication/22829a-return-to-work-safely-protocol/

The Health and Safety Executive
www.hse.ie

The Health and Safety Authority
www.hsa.ie

Return of Small Retail Outlets
Induction Checklist

The following checklist is intended as a guide for you to confirm with your employees that they are aware of the HSE / HSA guidelines for return to work. Use this checklist to confirm with each employee, that they understand the protocols under the following headings.

Health and Safety Documentation prepared & communicated to employees	☐
Employee is aware of and has access to appointed COVID-19 LWR	☐

Physical Distancing

Travelling to / from work	☐
Written procedures for managing COVID-19 on return to work	☐
Additional control measures where required 2 metre social distancing is not possible	☐
Customer Facing Roles	☐

Hygiene

Handwashing	☐
Coughing / Sneezing Etiquette	☐
Touchpoints	☐
Cleaning / Disinfecting	☐

Welfare

Toilets	☐
Canteen	☐

Work Equipment

Controlled Access / Use	☐

PPE

Provision / Use	☐

Trainer: (Name & Signature)	**Date**:
Staff Member: (Name & Signature)	**Date**:

Contact us

We understand the importance of working together during these difficult times. If we can help you, please get in touch.

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