

Please note this is a live document and subject to change to ensure compliance with Scottish Government and Health Protection Scotland Guidance.

COVID 19 – PPE Interim Policy Framework for Services

Author	<i>Fiona Duddy</i>	Contact details	<i>duddyf@northlan.gov.uk</i>
Owner	<i>Gold Command</i>		

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Governance Committee	<i>Gold Command</i>	Date approved	
Review date	<i>As required</i>		

Strategic Alignment
<i>Health & Safety at Work etc Act 1974</i>

Consultation process	<i>Gold Command Trade Unions</i>	
Stakeholders		
	<i>All council services</i>	
Distribution	<i>All council services</i>	

Change record

Date	<i>16.07.2020</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the Council will adopt the exemption within the Scottish Government guidance in removing the requirement for members of the public to wear face coverings when accessing money services, namely our municipal banks. The document reflects we will also comply with the areas within the exemptions list considered 'reasonable excuses' not to wear a face covering.</i></p> <p><i>Further update to reflect the Scottish Government guidance specific to the return of Schools.</i></p>		
Date	<i>03.08.2020</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect Education specific guidance issued 30/7/20 detailing face coverings required for adults only where 2m social distancing cannot be achieved and there is close contact for 15 minutes or more. Further updated to reflect requirement for fluid resistant surgical masks required where intimate care is given to a pupil displaying covid symptoms or where there is a risk from a pupil of spitting, coughing or vomiting and in this scenario protective eye wear is also required.</i></p>		
Date	<i>01.09.2020</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the change in guidance requiring face coverings within Secondary Schools and on School transport for children 5 years of age and over.</i></p>		
Date	<i>30.09.20</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the requirement for employees to wear face coverings when accessing/egressing/moving around in buildings and also to consider their use when undertaking face to face meetings.</i></p>		
Date	<i>08.10.20</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the requirement for employees to wear face coverings when accessing/egressing/moving around in buildings is now a mandatory requirement.</i></p>		
Date	<i>30.10.20</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the requirement for senior pupils and teaching staff to wear a face covering within the classroom.</i></p>		
Date	<i>11.06.21</i>	Author	<i>Fiona Duddy</i>
Change made	<p><i>Updated to reflect the requirement for all secondary school pupils to wear face coverings at all times within School.</i></p>		

Background

The COVID19 pandemic has brought about unprecedented circumstances requiring the Council to maintain full service provision for critical services, whilst also acting quickly to protect the safety & wellbeing of our employees, service users, school pupils and the wider community of North Lanarkshire.

The Council has a clear duty of care under the Health & Safety at Work etc Act 1974 to provide a safe workplace for employees. Any cases of COVID 19 which are proven to have been contracted in the workplace are reportable under the RIDDOR regulations 2013 to the Health & Safety Executive.

During the course of the lockdown period, the Council has maintained the default position, guided by the Scottish Government, of 2 metres social distancing and homeworking wherever possible. Where neither of these measures are possible, the use of personal protective equipment (PPE) has been vital in ensuring the safety and wellbeing of our employees. PPE refers to a number of products such as eye protection, gloves, aprons, safety boots, visors, face masks etc. and many critical services within the Council have been required to adopt a variety of types as additional control measures over and above social distancing.

Given the wide scope and variety of services the Council delivers, it has also been necessary for us to undertake ongoing and detailed local risk assessments to identify additional or indeed enhanced measures, including PPE, to ensure that we manage our activities safely. All of this has been underpinned by a shifting landscape of specific guidance from the Scottish Government and Health Protection Scotland, which often requires us to rapidly interpret and adopt any guidance to ensure full ongoing compliance with our responsibilities.

As we proceed out of the lockdown phase and into recovery, and with more Council services opening concurrently with other sectors, including Leisure and Retail, it is clear that PPE will play an ever increasing role as a mitigating control measure which will be adopted to prevent the spread of COVID 19, particularly in settings where social distancing will be difficult to maintain or control effectively.

In light of this, and the growing breadth of guidance now available and still emerging for different settings, we have pulled together this comprehensive interim policy document which sets out all of the current PPE guidance aligned to the different settings we now have across the Council.

This is designed to ensure that services have a clear ongoing view of what PPE is currently required for their particular setting. It is also designed to ensure that as we recover and operate services during this period, there is a clear flow through from guidance in place or issued, to the assessment of required PPE following localised risk assessments and the regular ordering of PPE through agreed channels to ensure that it is fully available at the required level and standard.

Current Position for PPE

It is important to emphasise that in line with relevant legislation, the Council regards PPE as a secondary control measure with the primary focus being on the management of identified risks through elimination, reduction, preventing contact and safe systems of work. This process has been followed when reviewing the existing risk assessments during the pandemic, in addition to identifying those activities where PPE has been the correct control measure to implement.

Services who currently use PPE as part of their risk control have all been subject to a detailed review of their status in line with up to date guidance from the Scottish Government (SG) and Health Protection Scotland (HPS). Relevant detailed PPE guides have been created advising employees what is required for their role, as well as other information such as how and when PPE should be removed and replaced. A full list of these guides has been made available on My NL along with completed current risk assessments.

Updated Scottish Government Guidance

On July 2nd, updated information was issued by the Scottish Government indicating that in order to continue to slow the spread of COVID-19, 2 metre social distancing would be augmented with specific guidance and controls in some areas where the 2 metres could not be maintained or guaranteed such as in shops or on public transport.

<https://www.gov.scot/publications/covid-19-advisory-group-physical-distancing-advice/>

One such control, which has now been made mandatory from Friday 10th July was for the general public to wear a **face covering** in retail settings where social distancing is difficult to control.

A decision made by Gold on Friday 3rd July, in line with the guidance update was that all members of the public entering any NLC establishment will from Friday 10th July be required to wear a **face covering**. Within the Scottish Government guidance there is an exception for money services and the Council intends to apply this exception to our municipal banks. The Council will also comply with the other areas within the exemptions considered as 'reasonable excuses' these can be viewed via the link below.

<https://www.gov.scot/publications/coronavirus-covid-19-phase-3-staying-safe-and-protecting-others/pages/face-coverings/>

Within the School estate visitors will be discouraged but where this cannot be avoided they will be required to wear face coverings. This includes parents, contractors, Council employees and anyone who does not normally work within the School.

Given there had been an increase in covid positive cases the Council had decided to introduce the requirement to wear a face covering when employees enter and exit any Council building and also when moving around the premises. The Scottish Government announcement on 7/10/20 has now made this a mandatory requirement. Consideration should also be given to face coverings where any face to face meetings take place. (This does not apply to those with exemptions).

The default position for the Council remains that 2 metre social distancing will be adhered to within our organisation so far as is reasonably practicable. This will also continue to be supplemented with hand and respiratory hygiene. In line with the change in guidance we will now look at our risk assessments to identify measures which could apply where 2 metre social distancing is unlikely to be achieved or maintained. This includes reviewing settings where tasks could be undertaken using the SG suggested mitigating measures of optimising ventilation, using a mask or face covering, surface cleaning and utilising solid barriers such as perspex screens. This will be kept under review as guidance evolves and changes.

Face Masks vs Face Coverings

Health Protection Scotland has issued guidance as follows to ensure there is an understanding on the difference between masks and coverings. This is shown below:

It is important to note the difference between face masks and face coverings. Where HPS guidance refers to face masks this means surgical or other medical grade masks that are used in certain health and social care situations. Face coverings are made from cloth or other textiles that cover the mouth and nose, and through which you can breathe (e.g. a scarf).

The use of face masks is not currently recommended for the general population. There is no evidence of benefit to support the use of face masks outside healthcare environments. Face masks may be advised for those diagnosed with or suspected to have COVID-19 to reduce spread of infection in specific situations.

Physical (social) distancing, shielding, following stay at home advice, and good hand and respiratory hygiene practices are the key measures for preventing spread of COVID-1.

It is important that the Council recognises the difference detailed above to ensure we do not deplete PPE stock of masks required to protect those in critical services such as homecare when in fact it is face coverings that are required. This will be clearly set out in detailed PPE guides for services and settings.

Transitioning Through Recovery

The Scottish Government has put in place a clearly phased route map for recovery and as we move through each of the phases there will be an associated relaxation of the measures currently in place. As this progresses we will inevitably see further pressure on services in regards to their ability to maintain primary control measures such as rigorous 2 metre social distancing and home working. The associated and proper use of mitigating measures including PPE will therefore become critical to balance the effect of this, and ensure that we continue to mitigate all-risks of the further spread of COVID 19.

To ensure that services have fully up to date guidance on the use of PPE, a robust process for ongoing risk assessment and the ordering of relevant stocks of the right PPE for their particular setting, we have produced this interim policy framework which is designed to be used a part of overall recovery planning efforts.

The Scottish Government are clear that where the 2m distance is reduced further mitigating measures must be implemented and further guidance is awaited on this approach relating to specific sectors. The Council must be prepared to react quickly to any such change in order that it does not inhibit us from progressing with our service recovery work, by demonstrating a clear approach to risk assessment and PPE and outlining how any change in guidance would be adopted.

We have set out below in Table 1 the four discrete settings we currently have within the Council along with the associated full current PPE guidance relating to these settings. Also included is the most recent change relating to the use of face coverings/face masks.

Table 1

Setting	Existing PPE Guidance	Recent Changes (2nd July)
Close Contact Environment: For example	Specific guidance for health and social care settings (Homecare) can be found https://my.nl.co.uk/knowledge-base/covid-19-safe-ppe/	In line with risk assessment for the activity being carried out, appropriate mitigating measures must be implemented. This may include the use of face

<ul style="list-style-type: none"> • Health & Social care • FSS - Catering • Cemeteries 	<p>The relevant HPS Scotland can be found here HPS Website - Information and guidance for other settings (scot.nhs.uk)</p> <p>For non-health & social care settings, where there is a risk that staff are unable to socially distance from others additional mitigating measures should be considered. This should be ascertained following a full local risk assessment process.</p> <p>The relevant HPS Scotland guidance for non-healthcare settings can be found here https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/</p> <p>The full list of detailed PPE Guidance which has been created for relevant settings can be accessed here https://my.ni.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>All guidance documents have been written for the services where PPE is currently in use and are subject to change in line with guidance. If your service requires to create specific guidance following recovery or a change in government guidance covered here please email the Health & Safety team immediately at healthandsafety@northlan.gov.uk</p>	<p>coverings or masks where social distancing cannot be maintained or controlled. Risk Assessments require to be reviewed to determine the correct item of PPE required and the usage.</p>
<p>Education & Childcare</p> <p>Education Staff</p>	<p>The most up to date position for Schools opening on 11th August has confirmed that that there will be no social distancing required for Pupils.</p> <p>https://www.gov.scot/news/planning-for-re-opening-schools-safely/</p> <p>Staff should continue to maintain 2 metre social distancing wherever possible.</p>	<p>Within Primary School settings face coverings will not be required for pupils or staff in school, with the exception of where 2m social distancing cannot be achieved between adults and anyone else where close contact will occur for 15 minutes or longer.</p> <p>Scottish Government guidance at 25/8 states that face coverings will be required in Secondary schools for adults and young people within areas where it is difficult to socially distance eg. corridors, communal areas etc. Face coverings should also be worn where 2m social distancing cannot</p>

<p>Employees working with Additional Support Need Pupils</p>	<p>Specific PPE guidance for employees working with additional support need pupils can be accessed https://mynl.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>Individual risk assessments for ASN pupils have been reviewed to reflect the Covid situation.</p>	<p>be achieved between adults and anyone else where close contact will occur for 15 minutes or longer.</p> <p>From 30/10 the requirement for senior pupils and teaching staff to wear a face covering within the classroom was introduced.</p> <p>From 25/3/21 As an additional measure, face coverings should now be worn at all times by staff and young people in secondary schools; including S1-S3 learners (not just the senior phase) in classrooms, in communal areas and when moving about the school.</p> <p>Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with symptoms of COVID-19 and needs direct personal care.</p>
<p>Early Learning and Childcare Settings</p>	<p>Guidance for phase 3 re-opening of childcare settings can be accessed here</p> <p>https://www.gov.scot/publications/coronavirus-covid-19-phase-3-guidance-on-reopening-early-learning-and-childcare-services/</p> <p>https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-reopening-school-age-childcare-services/</p>	<p>Fluid-resistant surgical masks and eye protection should be worn if a risk assessment determines that there is a risk of splashing to the eyes such as from coughing, spitting, or vomiting.</p> <p>Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with symptoms of COVID-19 and needs direct personal care.</p> <p>Within Early Years Settings face coverings will not be</p>

		<p>required for staff, with the exception of where 2m social distancing cannot be achieved between adults and close contact will occur for 15 minutes or longer.</p> <p>Individual risk assessments for pupils requiring close contact assistance to be carried out to determine the need for any additional PPE in the current situation.</p> <p>Fluid-resistant surgical masks and eye protection should be worn if a risk assessment determines that there is a risk of splashing to the eyes such as from coughing, spitting, or vomiting.</p> <p>Gloves, aprons and a fluid-resistant surgical mask should be worn by staff if a child or young person becomes unwell with symptoms of COVID-19 and needs direct personal care.</p>
<p>Depots, offices or other operational locations:</p> <p>Waste</p>	<p>No specific guidance on the specific use of PPE in these settings has yet been published and social distancing, hand hygiene, respiratory hygiene and cleaning are the primary control measures which should be applied.</p> <p>The full list of existing detailed PPE Guidance which has been created for other settings which may include depots can be accessed here https://my.nl.co.uk/knowledge-base/covid19-safe-ppe-other-teams/</p> <p>Guidance for the waste sector has been issued and can be accessed here https://www.gov.scot/publications/coronavirus-covid-19-waste-sector-guidance/</p>	<p>Within Council office accommodation it is a mandatory requirement that all employees wear a face covering when they enter and exit the building and also when moving around the premises. Consideration should also be given to face coverings where any face to face meetings take place.</p> <p>Where 2 metre social distancing cannot be maintained or controlled whilst undertaking a work activity, additional mitigating measures should be considered and following a detailed risk assessment,</p>

		the appropriate control measure will be implemented. This may include the use of face coverings/masks.
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<p>Transport:</p> <p>For example</p> <p>Work vehicles</p> <p>School Transport – mainstream</p> <p>School Transport - ASN</p>	<p>Other than on public transport, specific guidance on the use of PPE in transport has not been published and social distancing, handwashing and cleaning are the primary control measures which should be applied.</p> <p>The SG is currently looking at other sectors where continued enforcement of 2m social distancing would adversely impact on the ongoing provision of services following recovery.</p> <p>Further guidance on additional measures to be implemented are awaited.</p>	<p>Risk Assessments required to be reviewed in line with the updated guidance and activity and movements should be taken into account.</p> <p>For all staff using public transport for service delivery (for example homecare workers) a face covering to be worn in line with Scottish Government guidance</p> <p>Scottish Government guidance 25/8 states there will be no social distancing required for School pupils on dedicated School transport however face coverings should be worn for all pupils aged 5 and above.</p>
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<p>Next Steps</p> <p>Through recovery group, and working in partnership with Health & Safety, Heads of Service will be asked to review the position with all of their services following the updated guidance, including the requirement to assist any member of the public who arrives at a Council building without one (with the exception of municipal banks where face coverings are not required and in compliance with the list of 'reasonable excuses' detailed by the Scottish Government).</p> <p>They will also be asked to consider activities currently undertaken which, if there is further changes to social distancing, may mean work activities can be undertaken with additional control measures. The framework outlined in this interim policy will be kept under constant review and will be updated as new guidance emerges. This will prompt the requirement for further ongoing risk assessment review and the ordering of PPE where required.</p> <p>All guidance to date has been shared with Trade Unions, who have also been given full access to completed risk assessments. This interim PPE policy framework will also be shared with Trade Unions for their review and input and they will be given full access to it on an ongoing basis. Following further SG/HPS guidance updates this document will also be fully reviewed and reissued to reflect all changes and where necessary a review of all associated risk assessments will be undertaken.</p>
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Ordering of PPE

There is already an effective process in place for the periodical capture and ordering of required PPE stocks, through the joint equipment store and this is currently used successfully. This process will be adapted and more broadly deployed, with checks through recovery group to ensure that Heads of Service are reviewing and ordering appropriate stocks of PPE as guidance and risks assessments change.

Where large volumes are anticipated, following an update to SG or HPS guidance the procurement team will assist with the additional purchase of PPE stocks to ensure that this does not impact on recovery or service delivery.

Recommendations

- The Council continues to adhere to Scottish Government and Health Protection Scotland guidance
- The Council continues to maintain social distancing as the default position but with increasing consideration of the adoption of PPE and other controls to align with the recovery process.
- Upon receipt of further SG guidance reducing the requirements for the 2 metre distancing appropriate work will be undertaken to implement suitable and sufficient controls
- Communication is issued to the public regarding the requirement for face coverings when they visit Council buildings with the exception of municipal banks where an exemption applies
- Heads of Service to start planning where activities could be managed in the event of reduced social distancing requirements and use of face coverings and likely quantities.

Further information

Scottish Government
Health Protection Scotland
Health and Safety Executive

<https://www.gov.scot/coronavirus-covid-19/>
<https://www.hps.scot.nhs.uk/>
<https://www.hse.gov.uk/>