

Working on site during the COVID-19 pandemic: Construction Guidance Revised 22/12/21

Introduction

With the arrival of the highly infectious Omicron variant, all businesses are being asked to strengthen compliance with protective measures and to make an extra effort to do so.

In support of this, the Scottish Government has updated its “Safer Businesses and Workplaces Guidance” to provide comprehensive advice on baseline measures and good practice that should be considered by all businesses, employers and employees to minimise risk of exposure to coronavirus. A link to the guidance can be found [here](#)

The new guidance has been backed by amended Regulations (published on 17 December 2021) which require all businesses to “take such of those measures as are reasonably practicable to minimise the incidence and spread of coronavirus on its premises”.

Examples of the measures, included in the guidance, that should now be considered include those which limit close face to face interaction and maintain hygiene such as:

- Supporting working from home
- Increased hygiene and cleaning
- Maximising good ventilation
- Encouraging staff to take LFD covid tests twice weekly
- Controlling the use of or access to parts of premises
- Changing the layout of premises and
- Putting in place protective measures such as signage, barriers, screens and other mitigations
- Providing information about how to minimise the risk
- Providing or requiring the use of PPE

It is also now the law in Scotland, subject to existing exemptions, that face coverings must be worn in all indoor communal areas in a workplace, where there are no measures in place to keep persons separated by either a partition or a distance of at least **two metres**, and on public transport.

The Scottish Government also continues to advise people, especially indoors, to keep a safe distance from those not in their own household.

In view of the emergence of the Omicron variant and publication of the new guidance and regulations, Construction Scotland has undertaken a review of this Site Operating Guidance and has made a number of changes to the information and guidance contained within, including that on the wearing of face-coverings, which are intended to assist companies in complying with the new regulations and preventing spread of coronavirus on sites.

Purpose of this guidance

Covid remains a very significant hazard and the risk of infection needs to be considered and controlled by construction companies, under existing general Health & Safety legislation and obligations.

All construction sites operating during the ongoing COVID-19 pandemic need to ensure they are following the latest guidance from NHS Scotland and the Scottish Government. In addition to the Safer Businesses and Workplaces Guidance mentioned above, information to help protect the workforce and minimise the risk of spread of infection is available on [NHS Inform](#)

This document contains sector specific guidance, based on current construction industry practice and experience, intended to enable the continued implementation of appropriate measures on sites of all sizes, in line with current Scottish Government Regulations and guidance.

Each business will need to translate the guidance contained in this document into specific actions, depending upon the nature of their work and how it is organised, operated, managed and regulated.

Site access, layout, welfare facilities, logistics and operations, etc., must be risk assessed and planned to ensure that physical distancing (see specific section below) and enhanced hygiene recommendations can be followed. If there are operations essential to completion of the project that cannot be undertaken within the parameters of physical distancing, then they must not take place until a task specific risk assessment has been completed and appropriate control measures implemented (refer to the “Risk assessment & controls” section that follows).

For information on working within occupied domestic premises, reference should be made to current Scottish Government regulations and guidance and to the CICV Forum document “Work to be carried out in domestic premises” a copy of which can be obtained [here](#):

[Notwithstanding anything contained in this document, all contractors and personnel must make themselves aware of and comply with the latest Scottish Government Regulations on the prevention of spread of Coronavirus at all times.

This guidance does not supersede any legal obligations relating to health and safety, employment or equalities and it is important that as a business or an employer you continue to comply with your existing obligations, including to those individuals with protected characteristics. It contains recommendations to take into account when considering how to comply with these existing obligations.

It must be stressed that “normal” non-COVID-19 related health & safety must not be compromised. It is a legal requirement that all construction occupational health and safety risks MUST be properly controlled at all times.

In accordance with existing health and safety legislation, if an activity cannot be undertaken safely due to a lack of suitably qualified personnel or supporting resources required to provide a safe system of work, it must not take place.]

Risk Assessment - Overview

The Health and Safety at Work etc Act 1974, the Management of Health & Safety at Work Regulations 1999, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Construction (Design and Management) Regulations 2015 and other relevant legislation continue to apply to any construction project carried out during the COVID-19 pandemic.

All contractors, or principal contractors, have a duty to take account of the health and safety risks to everyone affected by the work (including members of the public) in planning, documenting and managing the measures needed to control those risks. Risk assessment and the communication and implementation of appropriate control measures is a fundamental requirement of the above legislation.

Such measures need to take into account the nature of the site, the work to be performed, the number of people working on the site, the changing nature of the site as work progresses and other local factors and be documented in a Construction Phase Plan, including risk assessments and method statements (RAMS).

Risk Assessment - Consultation

Employers have a duty to consult their people on health and safety. They can do this by listening and talking to them about the work and how they will manage risks from COVID-19. The people who do the work are often the best people to understand the risks in the workplace and will have a view on how to work safely.

Involving them in making decisions shows that you take their health and safety seriously.

Employers must consult with the health and safety representative selected by a recognised trade union or, if there isn't one, a representative chosen by workers. As an employer, you cannot decide who the representative will be.

The specific risks of working during the COVID-19 pandemic and the associated control measures, including any physical distancing requirements, must therefore be considered and documented in Risk Assessments by duty holders, in compliance with their normal health and safety management procedures. Such risk assessments need to be written down unless an employer has less than 5 workers or is self-employed.

Whether written down or not, the risk assessment should be reviewed and continuously updated, as circumstances change, such as when Scot Govt COVID-19 risk levels go up or down and restrictions are tightened or eased.

Keep up to date with the latest COVID-19 information from the Scottish Government.

[here](#)

Consideration should also be given in risk assessment to workers returning after having COVID. This is in relation to “Long COVID”, their fitness for work and the type of work they will be undertaking. Such persons should be closely monitored on return to work.

Risk Assessment – Identifying the Hazard

COVID-19 is spread through respiratory droplets produced when an infected person coughs or sneezes. This can occur through respiratory droplets, by direct contact with infected persons, or indirectly by contact via contaminated objects and surfaces. The virus can stay on surfaces for up to 72 hours. The route into the body is via eyes, mouth, nose or airways.

The risk of COVID-19 spread is highest early in the course of the disease, particularly within the first 3 days from onset of symptoms. However, there is also some evidence that transmission to others may be possible 1-3 days prior to symptom onset (pre-symptomatic phase) or in individuals that develop infection but don’t develop symptoms (asymptomatic phase).

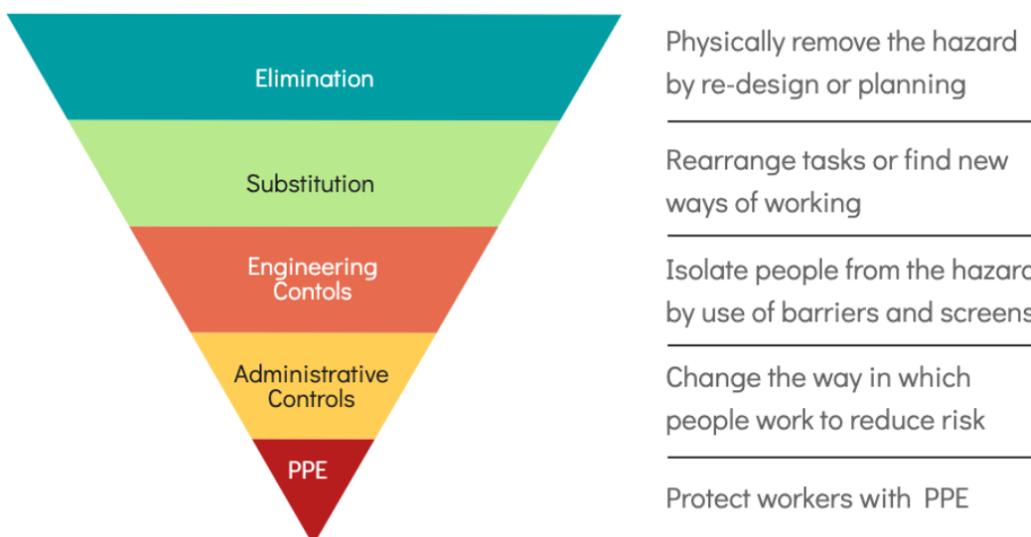
The risk of transmission is highest when there is close contact with an infected person and this risk increases the longer the contact lasts.

A range of measures are being used to control transmission of COVID-19, including physical distancing, hand hygiene, face coverings, testing and contact tracing. In Scotland the programme of community testing, contact tracing, isolation and support is known as ‘Test and Protect’.

Further details can be found on the Scottish Government website [here](#) , NHS inform [here](#) and Public Health Scotland [here](#)

Risk Assessment – Preventing & Controlling Risk – Hierarchy of Risk Control

Best practice is to follow the hierarchy of risk control, as illustrated below.



The further up the hierarchy that measures are implemented, the more effective will be the control.

The following table describes a typical hierarchy of controls and defines typical actions that can be taken to mitigate risk at each stage , in this case, in an activity risk assessment for close working

Hierarchy	Potential controls
Elimination	Remove the hazard so far as is reasonably practicable by, for example, re-designing or re-specifying the Product, changing the application or by altering the sequencing (e.g. preventing greater numbers/trades working within a defined area).
Substitution	Rearrange tasks or find new methods or equipment to enable tasks to be done by less numbers, whilst maintaining physical distancing
Engineering Controls	Consider whether a physical barrier can be provided to isolate people who will be working in close proximity for a considerable period of time.
Administrative Controls	Keep close working and the number of times close working is required, to a minimum. If close working is unavoidable consider working side by side or back to back, rather than face to face. To reduce cross contamination between squads/teams, limit personnel changes to teams. Provide additional supervision to monitor and manage compliance and consider enhanced authorisation process for those activities (e.g. close working permit system).
Face-coverings	Where reliance is placed solely on the use of Administrative Controls (and PPE facemasks are not required for another hazard) then, to reduce the spread of COVID, risk areas & activities should be identified and face coverings should be worn (see section on face-coverings below)
PPE	<p>The use of PPE is always to be considered as a “last resort” and all efforts should be taken to remove, substitute or control the hazard of transmission by physical means first. Where specifically identified in an activity Risk Assessment, PPE must be worn.</p> <p>Such equipment may include FFP2 or 3 face-masks, dependent upon the individual risk assessment and face fit tests should be carried out.</p> <p>PPE worn for specific activities (such as face masks, gloves, ear defenders etc) should ideally be single use, be a personal issue, not shared and disposable. Single use PPE should be disposed of so that it cannot be reused. Where PPE is the reusable type it must be thoroughly cleaned after use and not shared between workers.</p>

Documenting the measures required in method statements can help and the workforce should be provided with appropriate information, instruction and (where necessary) training to ensure they understand what to do. Toolbox talks could aid such briefings.

Any relevant sub-sector specific guidance should be referred to when considering the range of potential controls available.

Risk Assessment – Physical distancing

Physical distancing has been and will remain one of the most effective means of protecting ourselves from Covid-19. Whilst the physical distancing regulations have been lifted, we believe that all sites, implementing the measures described in this guidance, should continue to adopt a policy of maintaining a physical distance of at least 1m between individuals both indoors and outdoors (both in site facilities and work locations) and retain the flexibility to increase this to 2m, based on a Risk Assessment, should circumstances (such as individual or family vulnerabilities, local Covid infection levels or the nature of the work, for example, essential services) require it .

Risk Assessment – Preventing & Controlling the Risk – Face Coverings

Scottish Government regulations (see [link](#)) continue to require any person who enters or remains indoors within certain places, to wear a face-covering, unless exempt.

The places where face-coverings **must** be worn include: “canteens (unless eating or drinking)” and “**any indoor communal area in a workplace and where there are no measures in place to keep persons separated by either a partition, or distance of at least two metres**”

In the regulations, “communal area” means an area where people mingle or gather, such as entrances, passageways, stairs, lifts, staff rooms, training rooms or changing rooms.

One exemption to this regulation is when “eating or drinking”

In the context of a construction site, welfare facilities, canteens **and shared offices** should be considered as “communal areas”, with face-coverings required to be worn unless seated at a physical distance of **more than 2m**.

Outdoors and in work areas, the need for places (such as entrances, exits and communication routes) to be considered as “communal” should be determined following a risk assessment and face-coverings should be worn, when identified as part of a risk assessment.

Face coverings are effective in controlling the risk at source, providing a self-contained barrier to the respiratory droplets and therefore protecting the health of other persons. In such circumstances, persons with double vaccinations should also wear face coverings as they can still spread the infection,

(Note: Face-coverings have been defined as breathable fabric coverings which securely cover the nose and mouth, and which work best if they are made with multiple layers (at

least 2) and form a good fit around the face. They should be made of a material that will be comfortable and breathable, such as cotton”).

Risk Assessment – Preventing & Controlling the Risk – Close Working

When individuals are required to work **closer than 2m** indoors or outdoors, then a specific task risk assessment should be carried out for close working.

As described in more detail above under the heading ‘Hierarchy of Control’ , contractors should first of all seek to **Eliminate** the risk by looking for other ways to complete the task whilst complying with the physical distancing parameter. If this is not practicable, they must seek to **Substitute** the risk by changing the means used to carry it out; to apply **Engineering Controls**, for example by erection of a screen or barrier and/or to introduce strictly enforced **Administrative Controls**, such as reducing the frequency and time workers need to be close to one another.

Further appropriate mitigation measures that should be put into place when close working include:

- Increased hand washing
- Increased environmental cleaning
- Face coverings
- Keeping the activity time involved as short as possible

The points below should also be considered when completing a risk assessment for close working in an enclosed space:

- Vulnerability of the people involved, their family members and people they live with at home (e.g. health, age, vaccination status etc.) and are all those involved in close working doing regular lateral flow tests.
- The working space involved (size, ventilation, ability to have some distancing).
- Task itself (can close working be eliminated, exertion/physical force involved, risk of virus transmission).

Risk Assessment – Preventing & Controlling the Risk – Good Practice Examples

This section sets out guidance on how to work safely and builds on the more general advice provided in the Scottish Government document “Safer businesses and workplaces Guidance”, which can be accessed [here](#).

It gives practical examples of how generic guidance may be applied in the workplace. Each business should translate this into the specific actions it needs to take depending upon the nature of their business, including the size and type, how it is organised, operated, managed and regulated.

Businesses should also act on any relevant and appropriate advice that has been produced specifically for their sector by trade associations or trades unions.

Provision of cleaning products. Before commencing any works, all necessary cleaning products, including soap and water and alcohol-based hand rub (where available) must be available to every worker. If this is not the case, then work should not commence until resolved. Levels of these resources must be maintained for the full duration of the works.

Hand Washing. Provide additional hand washing facilities to the usual welfare facilities if a large spread out site or significant numbers of personnel on site. Ensure soap, clean hot and cold (or warm) running water and disposable hand towels are readily available and kept topped up at all times. Provide alcohol-based hand rub where hand washing facilities are unavailable. Regularly clean the hand washing facilities and check soap and alcohol-based hand rub levels. Provide suitable and sufficient rubbish bins for hand towels with regular removal and disposal. Sites will need extra supplies of soap, alcohol-based hand rub and paper towels and these should be securely stored.

Cleaning. Enhanced cleaning procedures must be in place across the site, particularly in communal areas and at touch points including taps and washing facilities, toilet flush and seats, door handles, handrails, plant & equipment controls, food preparation and eating surfaces, telephone equipment, keyboards, photocopiers and other office equipment. Rubbish collection and storage points should be increased and emptied regularly throughout and at the end of each day. Touch points should be regularly disinfected before use by anyone else. Maintenance of a stock of consumables to maintain cleanliness is essential.

Toolbox talks and other briefings (including inductions). Whilst toolbox talks and daily briefings are essential tools for communicating measures and gaining feedback from site staff and operatives, transmission risk increases in conditions where people gather in enclosed spaces and speak loudly to one another. For this reason, briefings (such as toolbox talks) should be given online wherever possible. If this is not possible, then they should be given outdoors, or indoors in a physically distanced, well ventilated space. Consider staggering briefings to reduce numbers attending each session.

Travel to Site & Vehicle Sharing. Car and vehicle-sharing has shown itself to be a high-risk situation for virus transmission and should continue to be avoided, where practical.

Workers should, ideally and where practical, travel to site alone, using their own transport.

Where one person-one vehicle use is impractical, a risk assessment should be carried out and measures taken to reduce risk, such as increased fresh air ventilation, opening windows and wearing face coverings. Car or vehicle sharing between members of the same or extended households is preferable or at least keeping the same members of a squad/team together in transit.

Public transport should be avoided where possible. This may result in increased parking arrangements for additional cars. Vehicles should be cleaned regularly (between shifts or on handover) using gloves and standard cleaning products, with an emphasis on handles and other touch surfaces.

Advice on travelling safely is available at-

[Coronavirus \(COVID-19\) - Transport Scotland](#)

Working from home. All employers should assess the minimum need for work to be done in office locations and make arrangements, including providing equipment where reasonable, to enable work to be done at home.

Site Access Points. Reduce risk by minimising visitors, issuing guidance for deliveries, stagger start and finish times to reduce congestion, consider physical distancing, minimising access points with one-way systems, remove or disable entry systems that require skin contact e.g. fingerprint scanners. Provide signage that all workers must wash or clean their hands before entering and leaving the site. Delivery drivers should remain in their vehicles if it is safe to do so and must wash or clean their hands before and after unloading goods and materials. Consider physical distancing when locating fire muster points.

Movement around the site. Reduce the need for movement around the site, where reasonable, by planning logistics and layout of site facilities. For example, when indoors, reduce the number of people in attendance at site inductions or toolbox talks, consider markings to indicate physical distancing/face coverings and consider having one way systems around site including, access scaffolding.

Toilet Facilities. Depending on government risk levels and site circumstances, consider displaying restricted numbers signage on toilet entry doors. Wash hands using soap and water before and after using the facilities. Enhance the cleaning regimes for toilet facilities particularly door handles, locks and the toilet flush. Provide suitable and sufficient rubbish bins for hand towels with regular removal and disposal.

Ventilation can have a major impact on reducing the risk of transmission. Ways should be considered to increase the supply of fresh air into any indoors space in which people have to work together, such as opening windows or doors or by mechanical means. A specific risk assessment should be carried out for each indoor setting.

(NB: In no circumstances should fire or security doors be breached to provide such further ventilation – other methods should be selected)

Reference should be made to the extensive Scottish Government and HSE guidance on ventilation for further information on how this can be used to help reduce the risk of transmission. The link to Scottish Government guidance on ventilation can be found [here and to HSE advice here](#)

First Aid on site. Consider how to be prepared to provide first aid to a person who may become injured due to a work activity, including protection of both the worker and the first aider(s) and pay particular attention to sanitisation measures immediately after first aid treatment.

Canteens and Eating Arrangements. Consider physical distancing, staggered break times, face covering (unless seated eating/drinking) and the provision of hand cleaning facilities or alcohol-based hand rub at the entrance/exit. Where catering is provided on site, it should

provide pre-prepared and wrapped food only and payments should be taken by contactless card wherever possible. Drinking water should be provided with enhanced cleaning measures of the tap mechanism introduced. Regular cleaning to be undertaken and tables should be cleaned between each use and put all rubbish straight in the bin,

Changing Facilities, Showers and Drying Rooms (where required). For physical distancing, consider restricted numbers in facilities at any one time and the introduction of staggered start and finish times, to reduce congestion and contact at all times. Provide suitable and sufficient rubbish bins in these areas with regular removal and disposal.

Working in teams. It is important, particularly for those who may need to engage in close working following a risk assessment, to reduce the number of people that each person has contact with on site. This may be achieved by using fixed teams or shifts or partnering so each person works with only a few others.

Workers' Accommodation. Certain sectors of the construction industry rely on shared accommodation and risk assessments must consider this in relation to the Scot Govt COVID risk levels. While the recommended position is for individual, self-contained accommodation for each employee, this is not always feasible. Workers should share accommodation only where it is not practicable for the workers to commute and where separate accommodation is unavailable or impractical.

Workers must comply with the latest physical distancing and public health guidance.

Special consideration should also be given by employers to situations where a worker may be considered as vulnerable and/or unwilling to share accommodation due to risk of COVID-19 transmission and efforts should be made to find suitable alternative accommodation which meets their needs.

When separate accommodation cannot be provided, and where workers are willing to share, worker numbers should be reduced, shared areas minimised, physical distancing made possible and adequate cleaning/washing facilities provided for users to 'clean as they go'. Residents should, where practicable, use shared rooms one at a time, with cleaning and ventilation in between (e.g. preparing and eating a meal).

Scottish Government guidance regarding the safe use of temporary workers' accommodation can be found on this link.

[Coronavirus \(COVID-19\): guidance on workers' accommodation - gov.scot \(www.gov.scot\)](https://www.gov.scot/Topics/healthandcare/coronavirus/covid-19/guidance-on-workers-accommodation)

Site Meetings. Use of remote digital technology (Skype, Facetime, Zoom, Teams etc.) for meetings where it is not essential to be a face to face meeting. So far as is practicable, in person meetings should be held in the open air and internally following the latest physical distancing, ventilation & face covering requirements.

Self-isolation. If a worker develops a high temperature or a persistent cough while at work, they should immediately don a face-covering, follow Test and Protect advice and

make arrangements to return home immediately, avoiding the use of public transport where possible. The worker should avoid touching anything, cough or sneeze into a tissue and put it in the bin, or if they do not have tissues, cough and sneeze into the crook of their elbow. They must then follow the guidance on NHS Inform and not return to work until their period of self-isolation has been completed. Test and Trace should be informed, the employer, principal contractor and contact made with any persons who may be at risk from close contact.

Once the worker has left the premises, the immediate area occupied by the individual should be cleaned with detergent and disinfectant. Any area that the individual has been in (work area, toilets etc.) should also be thoroughly deep cleaned.

For persons with COVID or those having been in close contact with COVID, the latest rules on self isolation must be followed. Employers can keep up to date on the latest guidance on self isolation, including duration and testing, by reference to:

Scottish Government: <https://www.gov.scot/>

NHS Inform: <https://www.nhsinform.scot/>

Public Health Scotland: <https://www.publichealthscotland.scot/>

HSE Advice.

Should anyone have a concern, the HSE advise contacting employee or trade union representatives or contact the HSE on telephone 0300 790 6787 (Mon-Fri 8.30am to 8.00pm), for COVID-19 enquiries. The HSE have also set up a whistle-blowing line which can be found on: <https://www.hse.gov.uk/contact/concerns.htm> It is also possible on this link to sign up for e-bulletins from HSE.

Note: HSE statement of policy on mist and fogging units. The current statement of HSE's position on these systems can be found at this link [Disinfecting using fog, mist and other systems during the coronavirus \(COVID-19\) pandemic - HSE news](#)

In summary, HSE say these systems do not prevent someone carrying the infection from transmitting it to others when they produce droplets containing virus particles, for example by coughing. Use of such equipment may run the risk of altering the behaviour of individuals such that they don't adhere as strictly to other control measures such as physical distancing and good hygiene, thus having an adverse effect rather than a positive one.

Mental Health support. For those suffering from low mood, anxiety and depression as a result of the current pandemic, information and support can be obtained from [NHS Inform](#), [Breathing Space](#), the [Scottish Association for Mental Health](#) and [Samaritans Scotland](#)

Risk Assessment – Checking Compliance (Inspections/Audits/Supervision) & Review

Supervision. The measures necessary to minimise the spread of infection rely on everyone taking responsibility for their actions and behaviours, maintaining good discipline. Where necessary consider the provision of enhanced supervision for effective monitoring.

Audit and inspection. During all phases of work, it is recommended that regular audits and inspections are undertaken to ensure that appropriate control measures are in place. Site supervisors should ensure that COVID-19 related controls are being properly implemented as part of their regular supervisory duties and inspections. H&S Professionals' site assurance should also include a review of site specific COVID-19 controls. Where possible, physical distancing should be maintained when undertaking inspections and consideration should be given to use of remote site inspection technology.

Review. Risk Assessments should regularly be reviewed for adequacy, including physical distancing, hygiene, face-coverings and ventilation measures. Encourage an open and collaborative approach between workers and employers on site where any issues can be openly discussed and addressed. Following monitoring checks and changes from Scottish Government, NHS Inform or Public Health Scotland, review risk assessments and communicate, to all relevant persons, any adjustments made.

[This guidance has been produced by Construction Scotland in collaboration with Scottish Government and the construction industry.](#)