

Construction Re-Start Plan

Introduction

In late April, Construction Scotland drafted a plan for the Scottish construction industry to be able to return to work safely, all in accordance with the Scottish Government document entitled "COVID-19 – A Framework for Decision Making."

The principles contained in that draft plan have now been adopted by the Scottish Government as part of their high-level document "Scotland's route map through and out of the crisis" and their sector specific guidance "Coronavirus (COVID-19): safer workplaces – construction sector guidance".

This document describes the Re-Start Plan in more detail and gives guidance on how the Scottish construction industry should respond.

Development of safe operating guidance

As confirmed in an earlier Scottish Government document 'Coronavirus (COVID-19): business and social distancing guidance', the Chief Medical Officer for Scotland advised that "...all non-essential business sectors – like construction (unless it is essential construction, such as a hospital*) - should close unless and until we can all be clear how operations can be undertaken safely and in a way that is fully compliant with social distancing. We will work with the construction sector – and others – to consider if it is possible to produce appropriate guidance on that specific point. Unless and until such guidance is issued, non-essential workplaces – including, in particular, construction sites – should be closed."

The Scottish construction industry complied with the CMO's advice and clarification on what is considered to be "essential construction" was subsequently issued by Scottish Government.

At the same time as the "essential construction" guidance was issued, Construction Scotland published guidance on how operations can be undertaken safely and in a way that is fully compliant with physical distancing (with risk assessment and potential use of PPE for essential elements of work that cannot be carried out without close working). The Construction Scotland guidance was referenced in the Scottish Government essential construction document.

The Construction Scotland Site Operating Guidance document has since been reviewed and amended for use on all sites and this Re-start plan should be read in conjunction with it. A copy of the latest version can be obtained here.



During the period of closure, the industry has taken the opportunity to review its site arrangements, operating procedures and working practices and has developed Safe Operating Procedures to ensure that physical distancing can be observed (with risk assessed and controlled close working where necessary).

These arrangements have been tested on the "essential construction" sites that have continued to operate and evidence of the implementation and use of these arrangements on essential sites, together with positive feedback from customers, has been received by the Construction Leadership Forum Safe Operating Procedures working group.

This group has also gathered evidence of the reviews conducted, procedures produced, and site arrangements being made for re-start on non-essential sites.

The conclusion from that evidence is that the industry has the expertise and capability and is ready to re-configure its workplaces to minimise the spread of the virus, and to work in a physically distanced manner at all times (with risk assessed and controlled close working where necessary).

The role of PPE

The traditional process of managing risk on construction projects is to use risk assessment, a formally documented process through which identified hazards (such as Covid-19) are subjected to a hierarchy of controls, with the use of PPE as the last resort once all other controls have been considered and implemented.

This is the risk management process that is being used on all current "essential construction" projects for any essential task that cannot readily be carried in a physically distant manner and that has been included within the Construction Scotland Site Operating Guidance document.

It is recognised however, that there is currently a shortage of "medical style" PPE (such as masks and visors) and that, during a period of such shortage, it would be inappropriate for construction to base its operating model on the use of such PPE.

The construction industry has proven ability to adapt and innovate in response to new challenges and the challenge posed by Covid-19 will be no different. Therefore, until innovative working methods are developed to enable all activities to be carried out in a physically distanced manner without "medical style" PPE, it is acknowledged that some activities on non-essential construction should not be carried out until supplies are restored to normal levels.

The revised CS Site Operating Guidance has been written to reflect this position for non-essential construction.



The impact of physical distancing on the numbers of site personnel

In preparation for working within the physical distancing parameters (with risk assessed and controlled close working where necessary), contractors have had to review the circumstances of each site individually. The planning work being done has shown that the numbers able to work within physically distancing parameters on site after Re-start is driven by the geography of the site, the nature of the project and its stage in development. The lack of space on some sites means that it will only be possible to return to work at a significantly reduced level of site resource. In some cases, this may be as low as 30% of the workforce previously employed. The process of reinducting the workforce and familiarisation with the revised arrangements also mean that it may take 7 to 8 weeks to build up to that reduced level.

The importance of "travel to work" planning ("door to door" control)

It is important for industry to also note the importance of "travel to/from work" in their Covid-19 planning. Our workforce has to be able to get to work safely and to not be perceived as a risk to the public in doing so. The industry will work with public transport providers to determine and put in place arrangements for safely utilising this form of travel and also take steps to enable the use of private cars or physically distanced shared transport. Supportive plans will be put in place for people to get to sites, whether public transport is available or not.

Raising issues on site

Employers have a duty to consult their people on health and safety. You can do this by listening and talking to them about the work and how you 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.

You 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 industry will take steps to raise awareness of and promote use of sector wide "whistle-blowing" websites and contact centres, in addition to any already set up on an individual company basis, through inductions, toolbox talks and publicity on sites.

In particular, the HSE have set up a whistle-blowing line which can be found on: https://www.hse.gov.uk/contact/concerns.htm



The Re-start plan and overall approach

The plan proposed for the industry's return to work is illustrated in Annex A. This plan describes a phased approach, reflecting the aims of "A Framework for Decision Making" by arranging a "managed transition from the current restrictions in a way that enables suppression of transmission of the virus to continue" and the progressive return to work for which most of the industry is already preparing.

The phasing is based on the work already done to determine the levels of resource that can safely work on each site, with resources building progressively to that level as the workforce are inducted and as they gain experience of using the new safe systems.

The Model defines the return to work in 6 phases, with different types of site progressing through Phase 1 differently.

| Scottish | Lockdown | Phase 1 | Phase 2 |
|--------------|-------------------|-------------------------|------------------|
| Government | | | |
| Phasing | | | |
| Construction | Phase 0: Planning | Phase 1: Pre-start Prep | All other Phases |
| Scotland | | Phase 2: Soft start | |
| Phasing | | | |

Phase 0: Planning

This is the phase the industry is currently in, when all contractors are preparing site assessments for Covid-19 modifications, developing new procedures, risk and method statements and preparing to re-start. Experience is being gained through the "essential construction" sites and through work being carried out elsewhere in the UK.

Phase 1: Covid-19 Pre-start Site prep

The next phase is the advance preparation of sites in line with the new site procedures. The work in this stage would be to facilitate physical distancing and enhanced hygiene and could include such tasks as:

- Installing new or expanding existing site welfare and toilet facilities
- Installing hand washing/sanitiser stations
- Alterations to form "one way" systems
- Installation of Covid-19 signage
- Marking 2m distancing throughout the site
- Re-modelling office and meeting rooms for physical distancing
- Cleaning of all site facilities and the workspace
- "Road testing" all new systems prior to supply chain returning to site



It is considered that, during this Phase, when numbers on site will be low, material deliveries to the site could commence, with controls as defined in the Site Operating Guidance, being implemented.

On a typical site, this work is likely to require no more than 10 operatives with 2 supervisors to ensure adherence to physical distancing. An example of a programme for such works on a typical site – a school project – is attached as Annex B, together with some photographic evidence of the type of work to be carried out as Annex C.

Phase 2: "Soft start" to site works (where physical distancing can be maintained)

This phase begins when the site preparations are complete and when it is safe to do so in line with public health advice. It will consist of a progressive return of a proportion of the original workforce to ensure that extended inductions, including site tours to explain the new arrangements for hygiene and physical distancing, are able to be carried out. The health and safety of the workforce is of paramount interest to the sector and there will be a phased return of a proportion of the workforce, brought back in "batches" to allow a high supervisor to worker ratio. This will allow extended inductions and site tours to familiarise the workforce with the new arrangements and allow time for those to become "the new normal."

As explained above, the number of workers able to return will depend upon the space available on site (both external areas and floorplates, if a building) and the welfare facilities that have been provided. Contractors will have to adjust their site facilities and work planning to ensure that physical distancing requirements are able to be met at each stage.

During this phase, due to the shortage of medical style PPE supply, only work that can be carried out within physical distancing parameters or using protective barriers, will be carried out. Risk assessment approaches will still be used to control the hazard of Covid-19 but if this shows that close working is still required and that protective barriers would be ineffective, that work will not be carried out until supplies of medical style PPE are restored to normal.

This means that some tasks will not be able to be carried out, although the industry will make strenuous efforts to develop innovative ways of completing critical tasks, working within the new parameters.



Phase 3: Steady state operation (where physical distancing can be maintained)

Phase 3 is the first of our phases to be included within Phase 2 of the Scottish Government's route map. Movement from the Scottish Government's Phase 1 to Phase 2 will be predicated on the criteria laid down in the route map document.

In this phase, the site complement will have reached a steady state level and, depending upon the site parameters, evidence suggest that this could mean that only 30% to 40% of the original workforce are able to be accommodated, due to physical distancing criteria. As in Phase 1, due to the shortage of medical style PPE supply, only work that can be carried out within physical distancing parameters or with physical barriers will be carried out.

Progress throughout Phase 3 will be subject to monitoring and supervision by site management, with any data/evidence gathered (such as site Covid-19 related absences) being used to inform continual review of management practices and arrangements to ensure safe working and physical distancing.

Phase 4: Steady state operation (with physical distancing, barriers or controlled close working with full PPE use)

Phase 4 will only commence once we are advised that medical style PPE supply to the NHS and Social Care staff is assured. Once this key point is reached, the wearing of such PPE (with associated discipline, such as permits to work, time limits, PPE work zones and close supervision) will be added to the range of measures available.

This means that those tasks omitted in earlier phases will now be able to be completed Progress throughout Phase 4 will also be subject to monitoring and supervision by site management, with any data/evidence gathered (such as site Covid-19 related absences) being used to inform continual review of management practices and arrangements to ensure safe working and physical distancing.

Phase 5: Increasing density/productivity with experience

As experience grows of working within the physical distancing parameters, site complements may be able to increase, but only to a density that enables physical distancing to be maintained at all times and that ensures protection of the workforce.

Cascade to micro businesses and the domestic sector

Principal contractors have a responsibility under the CDM regulations to ensure that safe systems of work are developed, documented in a construction phase plan and communicated to their supply chain working on site.

The industry will work with the Construction Industry Coronavirus (CICV) Forum and trade bodies, to take steps to ensure that the good practice being developed is made widely available to micro-businesses and those working in the domestic sector, though a



combination of web-based information portals, on-line training courses and other communication media.

Conclusion

The phased approach described in this paper and illustrated in the attached model will allow construction to re-start in a controlled and safe manner and has been endorsed by the Scottish Government

The key criteria for sites to return to work will be the ability of the site to achieve the physical distancing and safe working requirements, along with provision of adequate welfare and hygiene facilities.

Annexes:

Annex A: Site Re-start model can be found here

Annex B: Back to Work Readiness Programme can be found here

Annex C: Examples of Covid-19 modifications can be found here