

# Return to the workplace

## Guidance for retailers

March 2021

**The devolved Governments of the United Kingdom have set out dates for when the retail sector may be able to reopen again, as the vaccine roll-out protects an increasing share of the population.**

As we begin to adjust to this new dynamic, we need to consider aspects such as the work environment, health and safety compliance (COVID-19 risk assessment), fire safety management precautions, allied perils and security systems, and health and safety policies. But also, and perhaps most importantly, how customer behaviour and changing business models (e.g. a shift to e-commerce), will affect trading operations.



### Property

Fire safety arrangements in all premises must comply with the Regulatory Reform (Fire Safety) Order 2005 in England and Wales<sup>1</sup> or Fire (Scotland) Act 2005<sup>2</sup> in Scotland; Provisions will include:

- **Fire risk assessment** – ensure this is up to date and relevant to the current business activities, for instance storage and use of (highly flammable) hand sanitiser.
  - **When switching on mechanical and electrical services** that may have not been used for some time, ensure that heating and electrical appliances are clear of combustible items, gas appliances have not been left on and that sink taps and other plumbing devices have not been left open.
  - **Automatic fire alarm system** – where installed for life safety purposes ensure it is fully functioning (including weekly testing), maintained and any remote signalling system is operational and connected.
  - **Means of escape** – ensure exit routes are kept clear and doors are unlocked when the property is occupied by staff, guests, visitors or customers. Also ensure emergency signage is present and clearly visible and emergency lighting is tested and operational.
  - **Staff training** – ensure staff receive refresher training in what to do in the event of fire, including raising the alarm and emergency evacuation.
- **Electrical safety** – Over age and use, all electrical installations deteriorate and therefore safety checks commonly referred to as “Periodic Inspection and Testing” are required for fixed electrical installation. Five yearly testing intervals are suggested for most commercial properties, but more frequent testing may be required, such as annually for swimming pools. Ensure fixed electrical wiring testing, thermal imagery (where carried out) and portable appliance testing are all up to date.
  - **Cooking** – ensure appliance maintenance is up to date (particularly thermostats to regulate temperature of cooking oil), cooker hood filters and grease traps are cleaned and a specialist contractor employed to check the build-up of grease/fat in ventilation ductwork with the full length cleaned, as necessary.
  - **Escape of water** – after turning on water systems, where possible visibly check pipework/joints for leaks. This is particularly important following the freezing temperatures experienced in parts of the UK over recent months.
  - **Building maintenance** – inspect accessible areas of the building for signs of damage or deterioration, build-up of leaf and other debris in rainwater guttering and blocked downpipes/drain, stagnant water etc. Effect any necessary repairs to avoid water and other damage.
  - **Security** – inspect doors and windows for signs of damage and effect any necessary repairs. Where fitted, ensure the intruder alarm system is fully functioning, maintained and any remote signalling operational and connected.

<sup>1</sup><https://www.legislation.gov.uk/ukxi/2005/1541/contents/made>

<sup>2</sup><https://www.legislation.gov.uk/asp/2005/5/contents>

**Whilst immediate attention is understandably on ensuring premises are ready and fit for use you may also wish to consider the following other risk questions and suggestions:**



## Health and safety

- Have risk assessments (e.g. Legionella, slips, trips and falls particularly where sanitizers, sprays etc. are deployed, use of outside areas, etc.) been updated to reflect any changes in circumstances such as increased cleaning regimes social distancing in public areas, changes in 'traffic flow', reactivation of food serving areas, etc.?
- Are measures in place to fully brief and train all staff on any new control measures including rearrangement of space to allow for social distancing, introduction of new cleaning stations, etc.?
- Are adequate signs and notices in place, (for example within exit and entry points, requirements to wear masks, holding or queuing areas, etc.) and in line with the findings of any risk assessments?
- Has all plant and equipment been inspected and checked prior to a full reopening?
- Have cleaning regimes been appropriately modified to reflect changes in use of the premises (e.g. increased use of hand disinfectants, greater frequency of cleaning interventions, etc.)?
- Are inspection regimes in place to ensure that control measures are being adhered to?
- Has consideration been given to how changing rooms are managed and policy on garments which have been tried on (e.g. do they need to be separated for a certain period of time?)
- Has policy concerning returns and the potential additional hygiene requirements at the returns centre been considered?



## Supply chain

- Have you included your suppliers in the development of your return to work/ramp up plans? This may include goods, services, utilities, security, transportation, etc.?
- Do you have a plan for establishing an alternative source of supply or delivery?
- Do you have a clear view of the likely customer demand and have you made plans to adjust supply accordingly?
- Can the distribution and logistics elements of your upstream and downstream supply chain support your anticipated return to normal operations?
- Have you ensured that all time limited certification or licencing for equipment, processes or legal compliance has been renewed and is current?



## Physical and IT security

- Does your security regime take the new COVID requirements into account (i.e. reduced security staff levels, third party contracts, additional risks)?
- Have you put plans in place to deal with expired security passes and passwords?
- Have information security controls been reviewed considering changed working practices? (e.g. need for additional training/guidance)?



## Human resources

- Do your policies stipulate how working parents and staff with caring responsibilities will be treated as you transition people back into the workplace?
- Do you have agreed guidance/a policy in place for circumstances where employees do not feel safe to return to work?
- Have you planned for annual leave disruption as a result of COVID-19 (this year and next)?
- Have you devised a re-induction process for staff/contractors as they return to work to include for example, use of Personal Protective Equipment in all relevant areas?
- Have you consulted with staff about new ways of working and developed a short/medium/long term communications plan to ensure staff feel considered and informed?
- Are marshals or stewards correctly trained and equipped to manage people (including any conflict)?
- Consider weather and environmental issues when assessing risks e.g. staff may be deployed in outdoor contexts (queue stewards) as additional duties so may require more breaks, special personal protective equipment etc.
- Implement a plan to refresh all COVID-19 related training for all returning and newly recruited staff and retain records of its completion.





## Defending potential claims

- Make sure your COVID-19 risk assessments have been reviewed and the control measures are in line with current guidance.
- Implement a plan to refresh all COVID-19 related training for all returning staff and retain records of its completion.
- Ensure all equipment is thoroughly inspected and maintained before being brought back into use.
- Ensure all equipment requiring statutory inspection certificates have valid certificates in place.
- Ensure staff are trained in all activities where a task or operation has altered as a result of COVID-19.



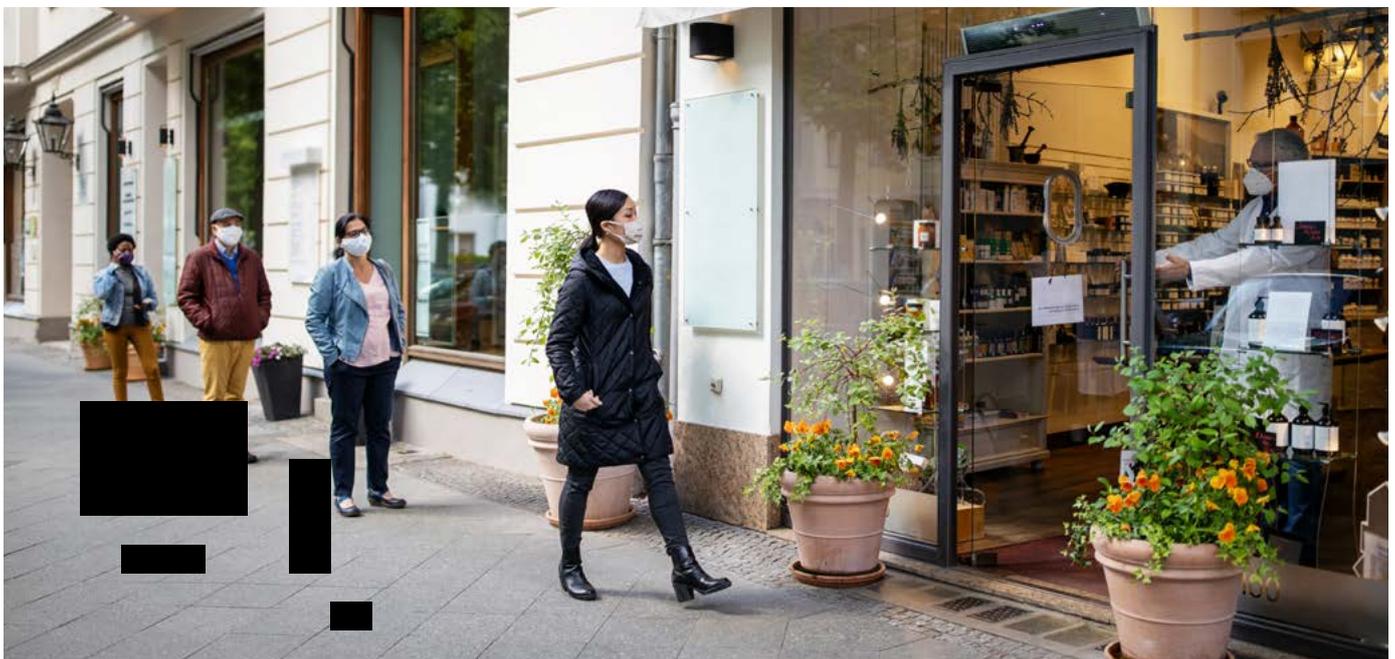
## Health and wellbeing

- Workplace stress assessments should be reviewed in conjunction with the health and safety risk assessment process.
- Consider employee wellbeing and mental health e.g. anxiety associated with places of work. This could include consideration of mental health first aiders and what provision you have in place to support employee stress/mental health.
- Review sickness management with defined HR procedures for employees unwell on site and those at home and to identify clinically vulnerable and extremely clinically vulnerable employees. (Even though the vaccination programme is ongoing this may still be applicable depending on whether or not people have had vaccinations at point of return to work and given the possibility of renewed infection rates or the appearance of other COVID variants.)
- Communications should be on an on-going basis and be tailored to the employees, e.g. retail based employees may require different communication methods to office-based employees.



## Transport

- Ensure all vehicles used on business are inspected, legal and roadworthy.
- Ensure drivers licence history checks are up to date.
- Provide refresher training to drivers with toolbox talks covering topics that may have changed (e.g. traffic volumes, PPE when driving, cleaning down of shared vehicles, etc).
- Ensure social distance obligations are maintained (e.g. when changing drivers).



**For further information please contact:**

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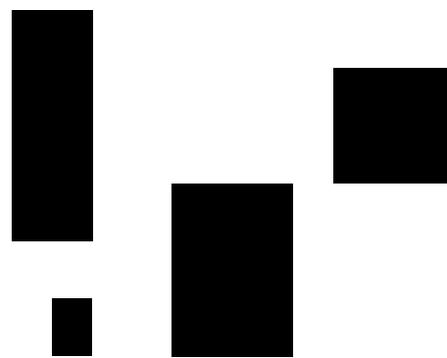
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Each applicable policy of insurance must be reviewed to determine the extent, if any, of coverage for COVID-19. Coverage may vary depending on the jurisdiction and circumstances. For global client programs it is critical to consider all local operations and how policies may or may not include COVID-19 coverage.

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