COVID-19 AND WASTE MANAGEMENT ACTIVITIES

This is version 11 of WISH's COVID-19 information document released on 6 August 2021. At the time of its writing many restrictions relating to COVID-19 were being revised, relaxed, or withdrawn, in particular relating to public health. For workplace health and safety, the onus has shifted from legally-required 'rules' to a more guidance-based approach with a greater emphasis on employer responsibility and assessment. As a result the nature of this information document has also changed. To assist readers with these changes, a new forward has been added. PLEASE READ THIS FORWARD BEFORE YOU READ THE REST OF THE DOCUMENT.

As with previous versions, this document is based on government advice, industry experience and current knowledge, all of which is subject to change. You should first follow the latest government advice. Note, section 4 of this document gives general precautions and section 6 specific issues – readers should study both sections.

It is NOT the intent of this information sheet to provide a general and comprehensive 'one-stop-shop' for advice on COVID-19. The emphasis is on waste management workplace specific issues. You should also read and understand available government and other advice. The links in this document are without prejudice - their inclusion does not imply WISH's approval. Please also note that links may be superseded – check the information is the most recent. This is a 'live' document and may be further updated. If you have any comments, please send them to info@wishforum.org.uk.

> **Note** – COVID-19 crosses-over public health and workplace health and safety issues. Public health is devolved in Scotland and Wales. Workplace health and safety is not a devolved matter. The government guidance noted in this document should be considered alongside local public health requirements and legislation and guidance in Scotland and Wales. In particular, the current lessening of public health restrictions may differ in detail and timescale between England and the devolved nations of Scotland and Wales – make sure you know which rules apply to your sites if you have operations in Wales and/or Scotland.

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For ease of accessing updates a brief summary of significant changes since the last version of this document is provided in green italic text at the start of each section.

1. Forward to version 11

Changes from previous version: This forward is entirely new.

Introduction

Version 1 of this WISH information document on COVID-19 was released on 2 April 2020. Version 10 was released on 28 April 2021. Throughout this period mandatory public health COVID-19 requirements were in force across GB, from full lockdowns and tier systems through various other legally enforceable restrictions. This is now changing with the emphasis moving from mandatory 'must-do' requirements to guidance and advice (subject to devolved nation differences – see note below). This change is, partially, reflected in workplace health and safety advice. For example, the move in England from 'Social Distancing' to 'reducing social contact' (see sections below). Accordingly, the emphasis of, and approach taken by, this version 11 of WISH's COVID-19 information document has also changed.

Previous versions of this WISH document included links to government, Health and Safety Executive (HSE) and other mandatory requirements. Some of these have been removed. Revisions have also been made to some of the mitigation measures included to align them with the above change in emphasis and, current, lower risk levels. However, what has **NOT** changed is that employers must assess the risks posed to their workforce and, while the risk may not be capable of elimination, put in place adequate controls to reduce these.

Note – variations in public health approach in the devolved nations of Scotland and Wales may result in some mandatory public restrictions remaining in place, or that the release and/or lessening of restrictions may occur to different timescales. You should be aware of these differences. You **MUST** first comply with relevant legal requirements.

Changing risk level

The potential health effects (hazards) associated with COVID-19 have not changed – in some people severe respiratory distress potentially resulting in complications such as 'long COVID' and, ultimately, death. Although more is known in detail today than when version 1 of this document was released, the transmission routes associated with COVID-19 have not changed. Airborne/aerosol transmission, poor hygiene and contact with contaminated surfaces are still the most likely routes, although current knowledge is that airborne/aerosol is very likely the most significant route. As the transmission routes have not changed, the basic measures aimed at reducing the risk of transmission have likewise not changed.

What has changed, largely as the result of a successful vaccination programme, and while people will still contract COVID-19, is the likelihood and severity of these health outcomes being experienced. Some people will still contract COVID-19 but, because of the vaccination programme, the likelihood of a severe outcome is lower in the majority of people.

All employers should already have a COVID-19 risk assessment/s in place. These now need to be reviewed to take account of the change in likelihood and likely severity of outcome, and consequential shift in emphasis in government approach from mandatory to advisory. The principles of risk assessment remain the same (see section 4 of this document under risk assessment), but your ratings of risk and control measures applied for COVID-19 may require revision. The aim being for your risk assessment to remain suitable and sufficient and to ensure that the controls you are applying are proportionate to the COVID-19 risk posed.

> **Note** – you should keep your risk assessment under review. New variants of COVID-19 may result in vaccination being less effective and in the future government may reapply mandatory controls if risk levels rise again. You should keep informed about developments and review your assessment accordingly. You should also keep informed about mandatory requirements which may remain in place, such as on self-isolation and what to do if an employee informs you that they have contracted COVID-19.

Please note that the lessening of public health restrictions and the move towards more employer responsibility for their own risk assessments does not mean an employer's statutory duties to ensure the health and safety of their employees have reduced or that you can simply drop all COVID-19 precautions. The statement below is from the HSE's website:

"From Monday 19th July, England moved into Step 4 of the Government's roadmap which means social distancing rules no longer apply. There are different approaches and timescales for easing of restrictions (and how that is affected by variants) in Scotland and Wales

"For businesses, this means you must still control the risks and review and update your risk assessment. Adequate ventilation, regular cleaning and frequent handwashing remain key control measures in reducing the potential spread of the virus. You must continue to consult your workforce on health and safety matters, talking to workers and their representatives helps to reduce risk. HSE published updated guidance on 19th July to reflect changes as a result of the lifting of coronavirus restrictions at https://www.hse.gov.uk/coronavirus/roadmap-further-guidance.htm.

"You can continue to reduce the risk of transmission during the pandemic by taking measures to limit the number of people your workers are in contact with, for example staggering the times people come into work or go home. UK government guidance at https://www.gov.uk/guidance/working-safely-during-covid-19 provides further information and advice on these measures covering a range of different types of work."

Application of this information document

This document contains information on COVID-19, such as in sections 2 and 3, and lists of potential measures, such as in sections 4 and 6. The general information provided remains valid, including on risk assessment. The lists of measures also remain valid. However, the selection of measures and the application and degree of application of these are now a matter for your risk assessment rather than being 'should-do' requirements. However, please note that legal requirements on ventilation, welfare and worker health remain.

At one extreme, an employer might decide, based on a review of their COVID-19 risk assessment, that they will remove all of the measures they previously had in place. Such a decision, while within the range of possible outcomes, is unlikely to be proportionate and would, therefore, likely be subject to challenge. At the other extreme an employer may take a risk-averse approach and maintain all of their COVID-19 controls. Judging where to sit between these extremes is a matter for risk assessment and is the responsibility of the employer. Many employers will probably take an approach during the review of their risk assessment which lies somewhere between these two polar opposites. Please note that the below are only examples – you need to do your own assessment and be certain that it is suitable and sufficient.

Example 1. If you operate HWRC sites you might decide, based on your risk assessment and in liaison with your clients, that you will remove restrictions on the number of vehicles on site (such as restrictions on number of car parking spaces) and allow members of the public to arrive on site unannounced rather than via a booking scheme. But you might also decide that you will retain a policy of not assisting members of the public with wastes to reduce social contact between your employees and the public. You might also decide to take a 'hybrid' approach with controls. For example, allowing members of the public to arrive unannounced during the week but keeping a booking system at the weekends when your sites are busier.

Example 2. If you operate domestic waste collections, you might decide that you will remove restrictions on the number of operatives allowed in vehicle cabs at any one time. But you might also decide to continue to instruct your employees to keep collection vehicle cab windows open to promote ventilation and to still avoid contact with members of the public to reduce social contact. You might also take a hybrid approach. For example, loosening a requirement for crews to remain strictly in their own cohorts by allowing a measure of transfer between crews to cover illness and holidays while maintaining a general approach of reducing any mixing of crews (in effect reducing social contact).

Note – one control you should not seek to relax is adherence to good hygiene practice. COVID-19 is not the only biological risk faced in waste management – wastes are frequently contaminated. When reviewing your risk assessment keep the emphasis on good hygiene to avoid degrading any improvements made in this critical area. You should also monitor COVID-19 infections in your workforce and react as required in terms of controls applied and degree to which they are applied.

This information document should be considered a resource you can use to better ensure that your risk assessment remains valid, is proportionate to the risks faced, and is practical in its application. You do not need to use all of the measures listed, and you might decide the ones you do select as being relevant to your risk assessment can be applied to a varying degree. However, you do need to ensure that you are protecting your workforce adequately and that you do not simply revert to exactly what you were doing pre-COVID, and that you continue to comply with legal standards. The risk level posed by COVID-19 may have reduced currently but it has not disappeared and might rise again in the future. To one degree or another COVID-19 is likely to be with us for the foreseeable future.

2. COVID-19 and waste management

Changes from previous version: The only significant changes to this section are general updates and some additional mention of variants.

Over the past 16 months the COVID-19 pandemic has represented an unprecedented situation. The information below is based on advice available at the time of preparation of this document and may be updated. Please check on the WISH website (https://wishforum.org.uk/) to ensure you have the most recent version.

What is COVID-19?

Coronaviruses are a family of viruses that can cause illness such as respiratory tract infections. The coronavirus known as SARS-CoV-2 is a strain first identified in 2019. The virus is problematic because of how easily it spreads, that the outcome in some people is more serious, with a higher mortality rate in some groups, than for most other viruses. Research shows that when uncontained one person, even if asymptomatic, may infect up to three others. Newer variants (see: https://www.gov.uk/government/collections/new-sars-cov-2-variant) may be even more infectious, although the precautions taken will be the same.

Why can COVID-19 be a problem for the waste industry?

Self-isolation, testing and vaccination are critical measures to reduce the spread and effect of the virus. Requirements to self-isolate, such as when instructed to do so via the NHS test-and-trace system ('test-and-protect' in Scotland and 'test, trace and protect' in Wales), can result in significant absence from work. While indications are that absence in the waste management sector has been lower than may have been originally feared, clusters of absence, and instructions to isolate, can and have had significant local effects on the delivery of essential waste management services.

COVID-19 and RIDDOR reporting

The HSE (Health and Safety Executive) has released guidance on reporting of COVID-19 cases under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations). See: https://www.hse.gov.uk/coronavirus/riddor/index.htm. However, that a waste operative may potentially have contracted COVID-19 from a workmate, such as if they shared a vehicle cab during their work, would not on its own make this reportable as an exposure to a biological agent at work without further evidence of direct causation. Further information is available at the link above and in section 7 of this document. If in doubt, contact the HSE for advice.

3. Symptoms and what to do if an employee shows or reports the symptoms

Changes from previous version: Significant changes to this section are the removal of some links and detail pending potential changes in self-isolation rules.

What are the symptoms?

The primary symptoms are reported as being fever, dry cough and in some cases a loss of the senses of smell and/or taste (there are indications that some newer variants may have additional or different symptoms). For more detail see:
https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/.

What to do if an employee shows the symptoms of COVID-19

Advice for those who believe they may have developed symptoms is available at:
https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance, or
https://www.gov.scot/publications/coronavirus-covid-19-test-and-protect/pages/advice-for-employers/, or, https://gov.wales/self-isolation-stay-home-guidance-households-possible-coronavirus.

If a person with no symptoms themselves has only been in indirect or potential contact with someone who has or is suspected of having COVID-19, there is no automatic reason for them to stop work and go home. Likewise, if one employee has been confirmed or is suspected of having COVID-19 there is in general no automatic need to send the whole of the rest of the workforce home, although close workplace contacts may in some situations need to self-isolate (see subsection below on testing and the NHS 'test and trace', called 'test-and-protect' in Scotland and 'test, trace and protect' in Wales, scheme, and its associated guidance). However, a thorough cleaning of the area they work in (office/cab/rest room etc) is strongly recommended (see links below under cleaning procedures for advice). Should an employee show the symptoms of COVID-19 while at work:

- Instruct them to leave work immediately and follow government advice, including to apply for a COVID-19 test, even if they state they feel well enough to continue to work
- Instruct them to stay at home to recover and follow government advice
- Instruct them not to return to work until free of fever, feeling well enough **AND** they have complied with relevant government requirements on self-isolation
- Instruct them to contact their workplace should they subsequently be confirmed as having COVID-19 (provided they are well enough to make such contact)

- Instruct them to contact their workplace after they have complied with relevant government guidance on self-isolation and if they are well enough to return
- Clean their work area (office, vehicle cab and similar) thoroughly before allowing other persons to access them (see links below under cleaning procedures for advice)

Should an employee develop symptoms while not at work, they should be instructed to notify their employer via telephone, e-mail, text or similar as soon as they believe they have the symptoms. They should be instructed **NOT** to come into work in person to inform their employer. The same basic process as above should then be followed.

Employees returning to work after a period of self-isolation, or having recovered from COVID-19, may face adverse reaction from their workmates for reasons such as a perceived continuing risk of infection. Whatever the basis for such reactions, employers should be aware of this risk and manage returns to work to avoid potential discrimination. For example, the reinforcement of anti-bullying policies and similar. Employees returning from furlough may also receive adverse reaction and resentment from those who have worked throughout the 'lockdown' periods and employers may need to consider this. This effect may be particularly significant if those who continued to work feel that those who have been on furlough have 'had an easy time of it'.

In addition, employers should consider, dependent on the length of absence, whether returning workers require reinforcement or repeat training and/or updating on any changes in work methods, processes and controls which may have been made during their absence.

4. Controlling the spread of COVID-19 – general precautions

Changes from previous version: Significant changes to this section include revisions to reflect the shift in onus from statutory requirements to guidance and various updates to reflect the current developments in risk and risk outcome levels.

This section covers general precautions for consideration. Section 6 below includes specific considerations for different operational types and situations. Both sections need to be read.

Controlling the spread of COVID-19 and workplace advice

Full details of how COVID-19 is transmitted are still, to a degree, uncertain. Despite the recent lowering of some public health requirements, the main methods to reduce transmission risk stay the same. In addition, the requirement to follow legally required health and safety standards remains, COVID-19 or no COVID-19.

Note – COVID-19 crosses-over between public health and workplace health and safety matters. The primary aim of this document is to provide workplace advice. Public health is a devolved matter, with separate organisations in England (Public Health England), Scotland (Health Protection Scotland) and Wales (Public Health Wales). Workplace health and safety is not a devolved matter, and for the majority of waste operations the Health and Safety Executive is the regulator. It is inevitable that some workplace guidance on COVID-19 also includes public health issues and public health advice can also include workplace matters. Operators need to ensure they are fulfilling both their workplace and public health responsibilities. Notwithstanding the above, the aim in all cases is to reduce to the reasonably practicable minimum the risks associated with COVID-19.

During the earlier stages of the pandemic government issued various workplace guidance documents which, largely, took a prescriptive approach. These guidance documents have now been revised to reflect the change in onus from legal requirements to employer responsibility and, in general, now provide considerations for input into employer risk assessments (some mandatory requirements remain). None is specific to waste management, but they may provide useful advice. For example, the guidance on construction may be relevant to HWRC/CA sites and landfills. See: https://www.gov.uk/guidance/working-safely-during-covid-19.

Note – over the course of the pandemic hundreds of guidance documents have been produced by government, the devolved administrations, and other bodies (including this WISH information document). Revising all of these documents, or withdrawing them, will take effort and time. A significant number of the documents this information sheet previously provided links to are now noted with statements such as "this guidance has not yet been updated for step 4 of the roadmap" or similar or have clearly not been updated for a period of time (in some cases for more than a year). As a result, to avoid confusion, many of these links have been removed from this information document. Employers need to be wary of the status of older documents they may discover during internet and similar searches and are advised to check their status. Notwithstanding this, much good advice is still included in some older documents, and they may still be of use as inputs to your risk assessment.

The HSE's advice on COVID-19 and working safely has also been updated and is available at: https://www.hse.gov.uk/coronavirus/working-safely/index.htm. Employers should read this advice. The HSE also operates a 'Contact HSE' service including COVID-19 at: https://www.hse.gov.uk/contact/index.htm.

Risk assessment

Employers must undertake and review their own COVID-19 assessment/s which take account of their specific situation and circumstances. It is not the intention of this document to dictate a format or content for assessments – this is a matter for individual employers. However, the suggestions and considerations given below may assist: These are suggestions and not intended as requirements.

As noted in the forward to this information document (see section 1), COVID-19 assessments now require review to ensure they are still suitable and sufficient and that the shift from legislative rules towards more employer responsibility is reflected (see the forward to this document in section 1 for more information).

Having a risk assessment in place does not, by itself, ensure that COVID-19 risk has been reduced so far as is reasonably practicable. Employers need to go beyond simply writing an assessment – the precautions arrived at must be in place, monitored to ensure compliance and updated as required to reflect new information and developments. See also updated HSE advice at: https://www.hse.gov.uk/coronavirus/working-safely/risk-assessment.htm. In addition, the information at: https://www.hse.gov.uk/coronavirus/working-safely/talking-to-your-workers/index.htm and https://www.hse.gov.uk/coronavirus/working-safely/protect-people.htm.

Note – the assessment process should include a meaningful 'interrogation' of work practices and controls to ensure they are adequate. COVID-19 has introduced an additional factor and your interrogation of controls and practices needs to take this into account. Starting with what your pre-COVID work practices and controls were and 'reverse-engineering' a risk assessment to justify returning to these with no change may not represent the lowest reasonably practicable risk situation and might not be deemed an acceptable practice.

Tip – WISH has produced a reference document (WISH REF 07 example COVID-19 checklists – available on the WISH web site). While the checklists provided in this reference document are only starting point examples and need customising and adding to take account of an employer's specific circumstances, they may be useful in checking that your risk assessment covers the general areas it needs to. See: https://wishforum.org.uk/ under resources and reference documents (this document is currently under review).

Tip – the TUC (Trades Union Congress) has established a database of publicly available example COVID-19 risk assessments, available at: https://covidsecurecheck.uk/risk-assessments/. This database currently includes more than 300 publicly available examples of COVID-19 risk assessments. While WISH makes no comment on, or gives any approval to, the quality of any risk assessment on this database, and responsibility for an assessment being suitable and sufficient rests firmly with the employer, seeing examples of what other organisations are doing may be of use to employers when compiling their own COVID-19 risk assessment/s. However, please note that many of these were produced in the earlier stages of the pandemic and you may need to take this into account.

Risk assessment is one of the fundamental underpinnings of health and safety management. Assessments may be workplace, task specific or aimed at particular risks. For example, an asbestos risk assessment aimed at the specific risk of exposure to asbestos. A COVID-19 risk assessment may be best (at a business level at least) considered in this latter category. In this case, the specific risk is the spread of COVID-19. The hazards are situations, activities, tasks, work areas and similar where transmission may occur. It may also be useful to consider the pathways through which a hazard may result in the risk occurring, such as spread via shared touchpoints, physical contact, and airborne transmission.

Waste Industry Safety and Health Forum

Many employers have taken overarching precautions to reduce the risk of the spread of COVID-19. For example, more homeworking with fewer people in offices for fewer days, providing information to employees such as on what to do if they start showing the symptoms, staggering work hours etc. This type of overarching precaution may best be considered in a 'general work hazards' or 'business-level' assessment with the aim of assessing if the overall precautions being taken at a business level are adequate. This approach may avoid significant repetition within specific task and similar assessments.

> **Note** – for information on homeworking see: https://www.hse.gov.uk/msd/dse/home-working.htm?utm_source=govdelivery&utm_medium=email&utm_campaign=coronavirus&utm_term=headline-dse&utm_content=digest-19-aug-20.

Beyond these business-level precautions, specific controls may be required for specific activities, tasks, work areas etc. For example, in a recycling plant the 'task-hazard' of picking from a picking line may be identified as requiring specific controls. The transmission routes by which spread could occur can then be considered to arrive at measures, such as reducing the number of persons in a picking cabin at any one time by running two shifts instead of one, glove use (which should already be in place), frequent hand washing, using every other waste chute and staggered entry to picking-cabins to reduce social contact, regular cleaning of touchpoints such as conveyor controls etc. The specific advice in section 6 of this guidance may assist in identifying tasks, work areas etc and controls. Likewise, government workplace advice documents and the HSE advice noted above might also be useful.

Assessments should also consider who may be harmed. For task assessments this may be those involved in the task or in the work area, or it may be third parties such as members of the public. For business-level assessments this may, for example, include how any vulnerable or extremely vulnerable persons are being protected (see sub-section below). The vaccination status of your workforce may also, dependant on your specific circumstances, be a valid input (see sub-section below).

As for other assessments, involvement of the workforce and worker representatives can provide useful input. Such involvement may also assist in achieving workforce buy-in and help with compliance. See advice at: https://www.hse.gov.uk/coronavirus/working-safely/talking-to-your-workers/index.htm.

Ultimately, the purpose of a risk assessment is to ensure that adequate controls are in place. In this case to reduce the risk of COVID-19 spread. These controls may be at a business level, or specific to a task, work area etc. In addition, and as for other risks assessments, being able to demonstrate a clear link from hazard, through potential transmission pathway to risk may provide the best approach to ensuring control adequacy.

Tip – employers, in consultation with employees, decide how they structure their risk assessments. COVID-19 issues and controls may be added to existing task or activity assessments. However, an overarching assessment of precautions taken at a business level may be required. This could be in the form of a statement of the approach the organisation has taken to dealing with COVID 19 issues. In addition, having a single assessment summary taken from task assessments, or statement, may be better when communicating with employees. This is a matter for employers to decide.

Note – it is a legal requirement for employers who employ more than five people to record the significant findings of their risk assessments. These findings would include outcomes, such as controls, but may also include the process by which controls were arrived at and the information, guidance and standards used as inputs to the assessment. This information document provides such input to assessments. If an employer believes any measures are not reasonably practicable for their situation, rather than a control not being relevant, they would be wise to include a justification of why not in their significant findings, or potentially face challenge, including legal and regulatory, as to the validity of their assessment.

Good hygiene

One important control for preventing the spread of any infection is good hygiene (ventilation and other measures also have their role to play). Good hygiene practices should already be in place in waste management operations – these **MUST** be maintained (COVID-19 is not the only biological hazard in waste management). Employees should be instructed to:

- Use tissues to cover mouth and nose when they cough or sneeze (**CATCH IT**)
- Place used tissues in a bin (or bag) as soon as possible (**BIN IT**)
- Wash their hands regularly with soap and water (**KILL IT**)
- Clean surfaces and contact points regularly to get rid of germs (**KILL IT**)

For the above to be effective, employees need to have tissues available and, if employees are not site based, bags should also be available to dispose of used tissues. Employers should provide these.

As the pandemic has progressed over time there may have been a temptation to concentrate on other measures, such as screens and face-coverings. However, the first and one of the most important controls is good hygiene.

'Social Distancing'/reducing 'Social Contact'

Until recently the use of 'Social Distancing' ('Physical Distancing' in Scotland) was included in government advice as a primary control to reduce the risk of transmission of COVID-19. In general, this meant, where reasonably practicable, keeping 2 metres (>6 feet) away from other people. This strict principle has now been removed, although a level of distancing may still have a role to play in your workplace. However, 'reducing social contact' is included in updated UK government guidance. For example, its workplace advice states:

"From Step 4, social distancing guidance no longer applies and there are no limits on social contact between people from different households. COVID-19 can still be spread through social contact. You can mitigate this risk by reducing the number of people your workers come into contact with."

Note – for employers with operations in Scotland and Wales please also take account of any detail and timescale variations relating to the above in the devolved nations. At the time of writing of this document Social/Physical Distancing was still included in some devolved nation workplace advice documents – make sure you know what rules apply to your sites.

Reducing social contact can pose issues for some waste management activities. However, in general, you may still want to consider precautions such as staggering shift changeovers, not requiring drivers to collect lorry keys in person, staggering use of welfare facilities, limiting the number of people allowed at any one time in offices, welfare facilities and other areas, instructing drivers/collections operatives and HWRC workers to avoid direct or close contact with the public and similar. While not aimed specifically at waste management, see also UK government workplace advice documents at https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19 for examples of workplace advice on reducing social contact. Please note, as stated above, that there may be detail and timescale differences in the devolved nations – check the advice relevant to the locations of your operations.

Note – searches on the internet may reveal older and superseded advice on distancing and definitions from other countries or guidance aimed at sectors other than waste management. Current UK/devolved government and waste industry applicable advice should be used.

Fresh air/ventilation

Research and data collected since the start of the pandemic indicate that the risk of transmission is far lower outdoors than indoors, and that even indoors adequate ventilation is critical. Employers may wish to consider whether tasks which would normally be undertaken indoors can be safely done outdoors, and even where this is not practical or safe the role of good ventilation should be considered. For example, leaving roller and other doors open at workshops and offices, opening windows in offices, weighbridges, shared vehicle cabs and similar. For information on ventilation in the workplace see updated HSE advice at: https://www.hse.gov.uk/coronavirus/equipment-and-machinery/air-conditioning-and-ventilation/index.htm.

Cleaning procedures etc

Cleaning procedures should already be of a high order in any waste activity for basic hygiene reasons (COVID-19 is not the only biological hazard in waste management and maintaining any improvements in cleaning and hygiene resulting from the pandemic would be beneficial). Government advice specifically in relation to COVID-19 is available at: https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings or https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/. HSE advice is also available at: https://www.hse.gov.uk/coronavirus/cleaning/cleaning-workplace.htm. You should reinforce cleaning arrangements and may wish to consider the below:

- Ordinary cleaning, such as with soap and water, alcohol sprays, normal cleaning agents or disinfectant, will kill virtually all virus
- Damp dusting is better than dry dusting
- Cleaning telephones and computer equipment with wipes or by other means
- Cleaning crockery and utensils using hot water and detergents
- Cleaning of shared facilities, such as toilets and showers frequently, including door handles, toilet flush handles/buttons and similar 'touch surfaces'
- Staggering access to shared facilities may also assist with reducing social contact. For example, staggering times when employees change out of/into workwear in locker rooms, the use of welfare facilities etc
- Maintaining good hygiene for workwear and laundry services. Used workwear should be placed in bags and not left in a 'pile' on the floor. Laundry bags should themselves be laundered (to prevent secondary contamination) or disposable bags used. See also the cleaning guidance noted above

- In some cases, employees take their workwear home to launder. In these situations, employees should change out of their workwear before going home. Workwear should be bagged, such as in a 'bin-bag', and the same precautions as above taken

Handling wastes – can I catch it this way?

Research indicates the virus can survive on surfaces, although unless at high concentrations/loadings the risk of transmission is likely to be low. It is good practice to ensure a high standard of hygiene when handling waste materials, as should always be the case in all waste management activities. The virus survives on the skin for more than enough time to allow hand to mouth/nose/eyes transmission.

As the result of expanded COVID-19 testing, used lateral flow test (LFD) kits are likely to appear in waste streams in large numbers over the medium to long term. These used LFD kits contain 2-4 drops of liquid, some of which is absorbed into the cartridge of the kit and the rest is retained in the tube of the kit. Users, such as members of the public and workplaces, are being advised to bag used kits before disposing of them. Most of these used LFD kits will come from people who test negative. However, even if the used kit comes from someone who tested positive there is little or no increase in risk. Wastes by their nature are often contaminated and already potentially contain a wide range of biological hazards, such as pathogens, fungi, bacteria etc. with or without used test kits being present. The normal precautions taken by waste management operators against such contamination will be as effective for COVID-19 hazards as they are for any pathogen or other biological hazard.

Waste management employees undertaking tasks which may bring them into contact with wastes should already be working under appropriate precautions, such as glove use. Outside of the issue of COVID-19, wastes by their nature may be contaminated, including biological contamination. These normal precautions should continue.

Where waste has already been designated as 'clinical waste', clinical waste procedures should already be in place. Those procedures can be followed as normal.

PPE (personal protective equipment)

Two types of 'PPE' are often quoted relating to COVID-19: gloves and masks/face-coverings.

Gloves

To be effective glove use needs to be in conjunction with good hygiene measures, and good 'glove discipline'. For example, if an employee stops work to eat/drink/smoke, the basic process is gloves off, wash hands thoroughly, eat/drink/smoke, wash hands again, put gloves back on. For more information see https://www.hse.gov.uk/skin/employ/gloves.htm. Employees should be made aware of the limitations of glove use, such as touching their faces while wearing gloves which may be contaminated, and that gloves are no substitute for good hygiene and hand washing. Gloves should already be in use for non-COVID-19 reasons in many waste management activities, and this should continue. In the case of reducing the risk of transmission, gloves should:

- Be impermeable/waterproof
- Or, supported by use of impermeable gloves used underneath 'standard' gloves

Employees must be provided with an adequate supply of gloves and instructed to change gloves at a frequency appropriate to the type of glove and its use, and that glove use does not mean that good hygiene and hand washing are not required. For further details on disposable glove selection and use see https://www.hse.gov.uk/skin/employ/latex-gloves.htm.

Masks/RPE (respiratory protective equipment) and face-coverings

One item of PPE which has been the subject of much publicity is the use of face masks/RPE, and the use of the term 'face-coverings' has become common (see updated information at: https://www.hse.gov.uk/coronavirus/ppe-face-masks/non-healthcare/index.htm and https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own and the discussion in appendix 1 below).

In terms of public health, and while the general legal requirement to wear face-coverings in specific internal locations has lapsed in England (devolved nation requirements may differ), it seems likely that face-coverings will continue to be a feature of public life for some time. In addition, some employers, such as public transport companies, have decided to retain their mandatory use. Accordingly, the information given below in this document on face-coverings and masks has been retained as it still has validity.

Definitions – for the purposes of this document:

The term *face-covering* includes homemade coverings, snoods and scarves and various other similar items of face-covering available from on-line and other suppliers. Their common feature is that they are not manufactured to any formal standard, such as an EN standard, and do not have any formal protection rating applied to them, such as an FFP rating. There is no duty on employers to provide face coverings, although they may choose to do so.

Face masks/RPE are manufactured to formal standards, such as EN or equivalent standards, and often have a protection rating applied to them, such as FFP3. Masks/RPE range from surgical masks to air-fed hoods and orinasal masks. Where a risk assessment indicates there is the need for RPE employers are under a duty to provide it without charge.

Note – the use of a transparent plastic or similar face shield/visor has become popular for some people. The evidence is that such shields/visors provide little protection and should not be used on their own. See information at https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own, which includes the statement: "*A face visor or shield may be worn in addition to a face covering but not instead of one. This is because face visors or shields do not adequately cover the nose and mouth*".

Face masks/RPE are workplace items and come with employer duties, such as on provision, cleaning, replacement, fit-testing etc. Face-coverings are not and do not attract employer duties, although employers need to be aware of their use. Employers may also need to be careful as this is an area where public and workplace health issues may cross-over. Updated advice from the HSE on the topic of masks and face-coverings is available at: https://www.hse.gov.uk/coronavirus/ppe-face-masks/face-coverings-and-face-masks.htm.

Regarding *RPE/face masks*, the need for RPE (respiratory protection equipment) to protect from coronavirus must be based on risk assessment. For example, current guidance states that healthcare workers undertaking high risk aerosol generating procedures on COVID-19 patients are required to wear FFP3 respirators, whereas those simply looking after patients with COVID-19 wear fluid repellent surgical masks. Waste industry workers are unlikely to encounter the same level of risk. However, where a risk assessment has previously indicated that an employee would be expected to wear respiratory protection for non-COVID-19 reasons as part of their normal job, then they should continue to do so.

Prolonged use of RPE/face masks may also have problems. For example, wearers may be tempted to adjust the fit frequently risking hand to face contact, masks may become moist so trapping contaminants, germs and similar, and prolonged use may result in dermatological and other conditions. Experience and research indicate that the prolonged use of RPE is unlikely to be effective as a control and may introduce additional risks.

In addition, the cleaning of hands and removal of gloves before putting-on and taking-off RPE/masks (and face-coverings) is essential to avoid the potential transfer of contamination from hand/glove to RPE/covering, where it can be inhaled. Likewise, if RPE/coverings are left on contaminated surfaces, stored in pockets, or similar there will be potentially increased risk of the RPE/face covering becoming contaminated and that contamination then coming into prolonged contact with the skin or being inhaled or ingested. Working in waste management is not the same as working in a retail outlet. RPE (and face-covering) use is likely to require more rigorous hygiene standards to be effective. These need to be enforced, and more frequent replacement and/or cleaning of RPE is likely to be necessary.

As a result of the requirements above and the difficulties there may be in meeting them in, for example, waste and recycling collection settings, there is a potentially higher risk of failure of the RPE/face covering to control a risk. In addition, transference of the virus by hand and/or contaminated surfaces may also be a risk, though it is now thought that inhalation of airborne droplets/small particles is the primary route. Accordingly, waste management employers need to take these issues into account and should be wary of transferring practice from other sectors which may not have such potentially high hygiene and contamination issues.

Notwithstanding the above, where an employer decides to issue RPE for whatever reason:

- Their assessment should include the risk of employees placing overreliance on RPE to the detriment of other more effective controls such as ventilation and good hygiene
- Their assessment should also include a clear description of the reasons, including employee reassurance, why RPE is to be used and its limits in use
- Limit use of RPE to short periods and only in specific situations where adequate ventilation may not be reasonably practicable (experience and research indicates that prolonged use of RPE is ineffective as a control)
- Instruction of employees in the use, storage, replacement, and disposal of RPE, the limitations of RPE as a precaution and the risks associated with overreliance on RPE to the detriment of other more effective precautions

Note – while the situation has improved since the early stages of the pandemic, some organisations are still reporting shortages of specific types of RPE, and shortages may occur again in the future. Where alternative types and standards of RPE are being considered to address shortages, employers should ensure the level of protection provided remains adequate. Employers should also be wary if offered alternatives and standards they are unfamiliar with. For example, the US 'N' standard for masks. Such alternatives may be acceptable, but if in doubt competent advice should be sought.

Regarding *face-coverings*, few can have failed to notice their continuing high use, even though the legal requirement to wear a face-covering in specific indoor spaces has been removed in England (rules may differ in the devolved nations). This may change over time, but currently employers can expect some of their employees to still wear face-coverings. Where this is the case, employers may wish to consider advising their employees to:

- Wash their hands thoroughly with soap and water or use hand sanitiser before putting a face covering on, and after removing it
- When wearing a face covering, to avoid touching their face or face covering, as this could contaminate the covering with germs from their hands
- Change their face covering if it becomes damp
- Change and wash their face covering daily
- If the material is washable, wash face-coverings in line with manufacturer's instructions. If not washable, to dispose of it after use

Tip – some employees might go beyond face-coverings and come to work wearing formal RPE they have purchased themselves. In these cases, employers may wish to communicate to them that such RPE should not be relied on for protection, neither for wearer nor their workmates, and that the normal employer duties for RPE do not apply. Consideration may also need to be given to interface issues, such as a face mask impairing vision for drivers who wear glasses.

Comment – regards the disposal of used PPE. For used PPE from the healthcare and similar sectors guidance is already in place. For used PPE from other sectors, including waste management, and from the public, PPE should be disposed of into residual waste streams. Most PPE is not recyclable and can reduce the quality of recycling waste streams. Further advice is available at: https://www.gov.uk/guidance/coronavirus-covid-19-disposing-of-waste

> **Note** – some waste management activities require employees to go onto third party sites, including going into buildings in some cases. These third parties may have imposed their own mask/face-covering rules. As with other customer site and similar rules, these should be obeyed by the waste management employee/s involved. Conversely, if a waste management employee on a third-party site feels that the COVID-19 controls in place are inadequate they should report this to their employer, and they should be supported by their employer if they decide not to do the job because of their concerns.

Vulnerable and clinically extremely vulnerable persons

Persons with pre-existing conditions, or other individual factors, may be more prone to suffering more serious effects from COVID-19. Current guidance uses two categories - 'vulnerable' and 'clinically extremely vulnerable' persons. In outline, vulnerable persons may be more prone to the effects of COVID-19 because of factors such as their age, being overweight etc. Clinically extremely vulnerable persons include those with specific clinical conditions which may make the effects of COVID-19 extremely serious.

For updated advice see: [Protect vulnerable workers - Working safely during the coronavirus (COVID-19) pandemic (hse.gov.uk)](). However, and in general, employers should protect all employees, vulnerable or not, the precautions needed are typically the same, and adherence by employees to controls should be the same no matter their status.

In addition, for advice on clinically extremely vulnerable persons see:
https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19#work-and-employment-for-those-who-are-shielding and at
https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/19-july-guidance-on-protecting-people-who-are-clinically-extremely-vulnerable-from-covid-19. Advice is also available from the HSE at
https://www.hse.gov.uk/coronavirus/working-safely/protect-people.htm. Please note this HSE link also includes advice relating to pregnant workers.

As restrictions change, employers should consider carefully how, when and under what conditions they reintegrate clinically extremely vulnerable persons back into the workplace. If you employ any vulnerable and/or extremely vulnerable persons, this would be a valid input into your risk assessment.

Testing for COVID-19 and the NHS 'test and trace' scheme

Some people with COVID-19 do not display symptoms, which means the virus can be spread without anyone realising. Rapid testing, such as lateral flow devices (LFD), can be used to detect the virus quickly. The idea behind rapid testing is that cases can be identified and isolated to break the chain of transmission. Rapid testing is not always reliable and is intended to be combined with, and is not a replacement for, other measures and should not replace good hygiene etc. However, it may help build confidence in the workplace that employees are being safeguarded and can help businesses operate with a degree of confidence, particularly where interaction with the public is concerned. Workplace testing requires planning and thought. See: https://www.gov.uk/government/publications/coronavirus-covid-19-testing-guidance-for-employers/coronavirus-covid-19-testing-guidance-for-employers-and-third-party-healthcare-providers.

Outside of the workplace, testing is also available for those showing the symptoms of COVID-19, or if another member of their household is showing symptoms, and in some areas mass testing is available. See as appropriate: https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested or https://gov.wales/coronavirus-covid-19-testing-process or https://www.gov.scot/publications/coronavirus-covid-19-getting-tested/ for information.

Whether testing occurs in the workplace or not, it should be noted that the outcomes of testing may not be straightforward. See: https://www.nhs.uk/conditions/coronavirus-covid-19/testing-for-coronavirus/what-your-coronavirus-test-result-means/.

The NHS in England has introduced a 'test and trace' scheme. Guidance for employers on the scheme is available at: https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance. Equivalent schemes are also in place for Scotland (see: https://www.nhsinform.scot/campaigns/test-and-protect) and Wales (see: https://gov.wales/test-trace-protect-guidance-employers). The aim of these schemes is to allow rapid communication with the 'contacts' of an infected person so that they can be instructed to self-isolate to reduce the risk of transmission of the disease.

If an employee is contacted and instructed to self-isolate, they must do so, and their employer should co-operate (see note below for current and potential future exemptions). However, just because an employee has tested positive for COVID-19 does not automatically mean that the whole of a workforce needs to cease work and self-isolate, although those who have been in close contact, such as sharing a vehicle cab, may need to do so. If in any doubt, employers should contact NHS test and trace (or the Scottish or Welsh equivalents) and seek advice.

> **Note** – at the time of writing of this information document various 'exemption' schemes were being put in place in England (devolved nation approach may differ) for some types of key worker. In addition, it is forecast that from 16 August 2021 those who have been 'double-vaccinated' may not need to self-isolate. This is a rapidly changing area, and you should keep informed on any changes in requirements for self-isolation (as above, devolved nation requirements may differ to those in England – check if you have operations in Scotland and/or Wales) and ensure you remain compliant. You must remain compliant with mandatory rules on self-isolation even if this is inconvenient for your business.

Vaccination against COVID-19

A national vaccination programme against COVID-19 is underway and a significant portion of the population has already been vaccinated. In addition, annual 'booster' and similar vaccination campaigns against variants of the virus may become routine. Vaccination has a key role to play in reducing the effects of COVID-19. However, no vaccination programme is 100% and on its own vaccination does not remove the need for other precautions. In addition, persons who have been vaccinated may tend to view other precautions such as reducing social contact as being less important. Employers need to be aware of this and reinforce the need for other precautions, and always follow government workplace advice.

You may wish to consider the vaccination status of your workforce as part of your revision of your COVID-19 risk assessment. Not all adults have been vaccinated as yet, in particular younger persons, and some people cannot be vaccinated for medical reasons. Vaccination on its own is no reason to remove your workplace controls.

First aid provision

First aiders may, by the nature of what they do, may come into close contact with persons they are treating. Specific information is available at:
https://www.gov.uk/government/publications/novel-coronavirus-2019-ncov-interim-guidance-for-first-responders/interim-guidance-for-first-responders-and-others-in-close-contact-with-symptomatic-people-with-potential-2019-ncov, and from the St John's Ambulance web site at: https://www.sja.org.uk/get-advice/first-aid-advice/covid-19-advice-for-first-aiders/. Please also see updated HSE advice at: https://www.hse.gov.uk/coronavirus/first-aid-and-medicals/first-aid-certificate-coronavirus.htm.

5. Changes in response to COVID-19

Changes from previous version: There are no significant changes to this section.

Note – this section was originally written in April 2020 during the initial phases of the pandemic. It was subsequently updated to give guidance on the resumption of services which had been suspended. Most services have now resumed, and most employers have achieved or are achieving their 'new normal'. As a result, this section may be considered redundant. However, it has been left in place to inform in the event of further future lockdowns (or similar restrictions) which may result in a need to suspend some services again. It should be considered a reference document only against any future restrictions and read with this 'historical' context in mind, including the links provided.

Maintaining critical competencies and standards

Waste operations operate under strict standards of safety and competency. Any contingency and similar measures taken regarding COVID-19 must not compromise these.

Health and safety requirements, such as plant operator licences, permits to work, machinery lock off and isolation etc. **MUST NOT** be compromised: COVID-19 is not an excuse to reduce safety or training requirements. For example, reducing crew size in household collections to the point that safe reversing procedures cannot be followed.

Environmental permit/licence and other legal requirements must be maintained even during any widespread or local COVID-19 outbreak. If you plan to take any contingency or similar action, which may affect your permit/licence or have an environmental impact, you should contact your environmental regulator first, and you would be advised to keep up to date on any announcements, temporary regulatory position statements and similar from your regulator relating to COVID-19.

Change management

In response to COVID-19 many organisations have made changes to the way they operate. Health and safety should be a core consideration when considering such changes to avoid unintended consequences. For example, temporarily closing CA/HWRC sites may remove the risk of transmission at such sites but may also result in an increased demand for bulky waste collections, which may be simply moving a problem from one place to another.

Any modification to work equipment, including vehicles and machinery, in response to COVID-19 must be considered very carefully to avoid compromising other safety features, emergency escape and similar. Good change management is critical with any modification of work equipment.

Some employers have installed Perspex or similar 'screens' in workplaces and/or vehicle cabs, similar to those installed in some supermarkets at check-outs or those in place for security reasons in buses or other public transport vehicles.

Dependent on their design and placement, screens may reduce, to an extent, the risk from projected particles/airborne droplets, such as produced when someone coughs, but there is little evidence currently that they are effective in preventing the spread of viruses. Notwithstanding the above where an organisation does decide to install screens:

- A design change risk assessment should be performed to ensure that safety arrangements and features, such as emergency escape, machinery safety provisions and fixed and other fire systems, are not adversely affected by the installation
- The assessment to include the risk of employees placing overreliance on screens to the detriment of other more effective controls such as hygiene and Social Distancing, resulting in a higher risk of transmission, and what will be done to reduce this risk
- The risk assessment should also include a clear description of the reasons why screens are to be installed and their limitations
- Instruction should be given to employees on the limitations of screens and the risks associated with overreliance on screens to the detriment of more effective precautions
- Screens should be subject to the same cleaning regimes as other equipment

Please also see specific mentions of screens below under the sections on vehicles and collections operations and MRFs and recycling plants.

While changes to ways of working as a result of COVID-19 often need to be put in place quickly, they still need to be considered carefully to ensure any health and safety consequences are assessed, including as appropriate whether they meet the test of being 'reasonably practicable' (see: https://www.hse.gov.uk/risk/theory/alarpglance.htm). Likewise, relevant parties should still be involved when making decisions:

- Consult with employees on changes. They may have a different perspective and may also have knowledge and experience not held by management
- If a change involves third parties, such as customers/clients, consult with them

- For some changes, the involvement of specialists or external competent persons may also be required or advised

> **Tip** – decisions and changes made quickly may not be recorded with normal rigour. Organisations may be wise not to forget this aspect and ensure they record their decision-making process, risk assessments and similar which led to any change and the detail of the change, including the involvement of third parties, employee representatives and similar.

Staff shortages and changes to ways of working may result in longer working hours. Employees may also, understandably, have concerns about their work and COVID-19 risk (whether these concerns are well founded or not they may be very real to the employee). In addition, changes to services, such as HWRC/CA site operation and collections, may result in adverse responses from members of the public and others (at the time of writing of this information document indications are that incidents of violence and aggression towards HWRC operatives are increasing – employers need to be aware of this and always act should any incidents occur).

- Employers should monitor working hours to ensure that safety standards are not degraded, and be aware of the risks associated with fatigue (see: https://www.hse.gov.uk/humanfactors/topics/fatigue.htm and https://www.hse.gov.uk/humanfactors/topics/specific2.pdf for further advice)
- Employers should consider the mental health and wellbeing of their workers. This may not be directly work related, but employers may want to make information available such as at: https://www.nhs.uk/oneyou/every-mind-matters/?WT.tsrc=Search&WT.mc_id=Brand&gclid=EAIaIQobChMI6qHAmoz86AIVhOF3Ch1ENg7uEAAYASAAEgKNi_D_BwE. Resources are also available at: https://campaignresources.phe.gov.uk/resources/campaigns/82-every-mind-matters/resources
- Changes to services may result in adverse reaction from the public, including aggressive and violent behaviour. Such changes may relate to restrictions on entry and use at HWRC and similar sites, changes in collection routes as the result of increases or changes in waste arisings, self-isolation and other issues. As relevant, workers should be informed that all such must be reported and that in serious cases the police should be called. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate

Inspections, testing, maintenance, and repairs

Concerns relating to the examination of equipment, such as under the Lifting Operations and Lifting Equipment Regulations (LOLER) have been raised (see: https://www.hse.gov.uk/coronavirus/equipment-and-machinery/work-equipment.htm). Inspections of equipment should continue to be done and can be done safely. Tests, inspections, daily/weekly and similar checks, critical maintenance and similar must be maintained, unless legal derogations are put in place dictating otherwise.

Engineers who are working on sites where there are restrictions arising from the risk of COVID-19 infection should comply with site rules and advice regarding good hygiene practices and separation distances. Consideration needs to be given to protecting engineers but also, where relevant, any vulnerable persons who may be affected by their work. Such measures should already be in place at waste management operations and include for example the cleaning-down of equipment, mobile plant and vehicles before any maintenance and repair, and the use of appropriate PPE during such activities.

Returning to 'business as usual'

COVID-19 responses can include various changes to waste management services, perhaps most commonly the suspension of green and bulky waste collections and the temporary closure of HWRC/CA sites. Whatever the changes made, resumption of services needs careful consideration and planning. Waste management operators, and their clients, should plan for the resumption of services and returning to 'business as usual', or at least more normal services. How and when services return to normal, or closer to normal, may in some circumstances depend on national policy. The detail of such policy may vary between England, Scotland, and Wales and by local authority. Operators should check that they are following the policy relevant to the location of their operations. For general guidance on returning to normal see: https://www.hse.gov.uk/coronavirus/roadmap-further-guidance.htm.

Where businesses have been completely (not typical for waste management) or partially closed for a period of time, employers should consider at least the below as relevant:

- Reviewing their COVID-19 risk assessment and control measures
- Communicated with their employees
- Considered any machinery, structural, buildings and similar issues which may be associated with a period of inactivity

- Checked that any statutory inspections, such as for lifting equipment, local exhaust ventilation etc, are up to date and still valid (it may be wise to retest if the period of closure has been extensive even if they are still in date)
- Discussed any occupational health surveillance and similar issues with their occupation health provider
- Providing refresher training and checking that time-limited qualifications, such as for mobile plant, are still in date
- Providing their employees with additional and/or refresher information, instruction and training regards any changes and ongoing COVID-19 precautions

Where waste collection services, such as green and bulky waste collections, have been suspended, there may be a backlog of waste waiting for resumption of service. Waste management operators, and as applicable their clients, may want to consider:

- Phased resumption, such as not resuming all services at the same time
- Any additional resources required to tackle any backlog
- Communication with the public regarding the resumption of services, how this will be handled and any restrictions which will be in place
- For commercial waste collections, close communication with customers and clients to ensure that as they reopen services can be resumed in an orderly and safe manner

Where HWRC/CA sites have been temporarily closed their reopening needs to be planned carefully. In addition, during an ongoing pandemic where 'threat-levels' may rise and fall the general controls noted below may still be valid. Waste management operators, and their clients, may want to consider:

- Phased opening rather than opening all sites at once or partial opening, such as only accepting specific types of waste in the short-term. For example, only accepting green and bulky wastes or supplementing reopening with enhanced green waste or bulky waste collection services for the first few weeks
- Use of pre-booked time slots for members of the public rather than allowing everyone to simply turn-up at the HWRC/CA site
- Restricting access, such as by post code or 'odd/even' car registrations on different days to allow phasing of initial demand
- Restrictions on the number of cars allowed into a site at the same time, and using a 'one-in-one-out' approach when safe capacity is reached

- Queuing capacity, both on and off site, and how this will be managed. And, for off-site queuing advance communication and discussion with the local police force, and consideration of any police resource requirements
- Closing-off alternate car parking spaces to aid Social Distancing
- Reduced or extended hours of opening dependent on specific situations
- Use of floor markings (tape or paint) to reinforce Social Distancing
- Additional resources which may be required to manage any backlog
- Communication with the public regarding the resumption of services, how this will be handled, any restrictions on services which will be in place and similar
- External support which may be required, such as from the police, to manage the safe and orderly reopening of HWRC/CA sites, and communication and planning with such external resources before sites are reopened

See also section 5 on HWRC/CA site operation. Further guidance is also available at: https://www.gov.uk/government/publications/coronavirus-covid-19-advice-to-local-authorities-on-prioritising-waste-collections/managing-household-waste-and-recycling-centres-hwrcs-in-england-during-the-coronavirus-covid-19-pandemic, https://1ur6751k3lsj3droh41tcsra-wpengine.netdna-ssl.com/wp-content/uploads/2020/05/4-April-2020-NAWDO-HWRC-reopening-guidance-FINAL.pdf and/or https://www.gov.scot/publications/coronavirus-covid-19-reopening-and-managing-household-waste-recycling-centres/.

Some waste management operations, such as commercial waste collections, involve employees going onto third party company sites, such as customer sites. These third parties may have introduced additional controls or made changes to their ways of working in response to COVID-19. Operators should check before recommencing service. As has always been the case there is a duty on employers to communicate and co-operate on health and safety matters, and this would include on changes made in response to COVID-19.

The suspension of various waste management services in response to COVID-19 is often quick and sudden. The safe resumption of services is often more complicated and time consuming and requires careful thought and planning.

6. Specific advice

Changes from previous version: Significant changes to this section include revisions to reflect the shift in onus from statutory requirements to guidance and various updates to reflect the current developments in risk and risk outcome levels.

Note – much of the advice and information given below, and in sections 4 and 5 of this document, was written in April and May 2020 during the initial 'lockdown' in response to COVID-19. Many organisations have already returned to more normal business and service. In addition, the recent changes in approach taken by government to workplaces and COVID-19 mean that much of the below are now considerations rather than the 'rules'.

General advice on COVID-19 risk assessment is given in section 4 of this document. The controls listed below for specific operational types should be considered as potential input to COVID-19 assessments. However, as the result of recent changes in onus away from legally required workplace rules to more responsibility being placed on employers, which of the potential controls given below may be relevant to an employer and the degree to which they are applied is now a matter for risk assessment (see section 1 for more information).

Given below are considerations you may want to apply, based on your assessment, for specific operational types and functions. You should assess your own specific operations using the below, and reasonable practicability, as a starting point. You should also read section 4 of this information document on general considerations.

During the earlier stages of the pandemic government issued various workplace guidance documents which, largely, took a prescriptive approach. These guidance documents have now been revised to reflect the change in onus from legal requirements to employer responsibility and, in general, now provide considerations for input into employer risk assessments. None is specific to waste management, but they may provide useful advice. For example, the guidance on construction may be relevant to HWRC/CA sites and landfills. See: https://www.gov.uk/guidance/working-safely-during-covid-19.

The HSE's advice on COVID-19 and working safely has also been updated and is available at: https://www.hse.gov.uk/coronavirus/working-safely/index.htm. Employers should read this advice. The HSE also operates a 'Contact HSE' service including COVID-19 at: https://www.hse.gov.uk/contact/index.htm.

Routine inspections and monitoring

Employers carry-out routine 'safety inspections', and other monitoring to check that required standards are being met. This may be through regular workplace/site 'safety tours' or monitoring of standards during waste collections. Other monitoring may also include drugs and alcohol testing, occupational health surveillance and similar.

Where any changes have been made as a result of COVID-19, these should be incorporated into inspection and monitoring regimes. Putting in place an additional control aimed at COVID-19 is only part of the equation, checking to ensure controls occur is also required.

Monitoring precautions against COVID-19 is important. However, employers also need to ensure that monitoring for compliance with precautions aimed at other risks is also continued and not degraded. For example, employees being so concentrated on COVID-19 precautions that lapses in lock-off, work at height and other critical precautions occur.

> **Tip** – WISH has produced a reference document (WISH REF 07 example COVID-19 checklists – available on the WISH web site). While the checklists provided in this reference document are only examples and need customising and adding to take account of an employer's specific circumstances, they may be useful to inform your monitoring. See: https://wishforum.org.uk/ under resources and reference documents (this document is currently under review).

Street cleansing, public waste bins and fly-tipping

Litter and the contents of litter bins can include drug paraphernalia and may have been frequented by rodents. Clearing fly-tipped wastes, or looking for enforcement evidence in such wastes, may result in potential exposure to a variety of hazards, dependent on the nature of the wastes fly-tipped. Precautions and procedures should already be in place to ensure that persons collecting/clearing/inspecting such materials are suitably protected from harmful substances, biological agents and similar.

Litter and the contents of litter bins, including gloves, masks etc discarded by the public, can be collected, and bagged using normal precautions and procedures. Fly-tipped wastes should be approached as before through assessment of the wastes before clearing or inspecting such wastes and implementing controls appropriate to the hazards posed. In both these cases, if adequate precautions are already being taken, additional controls should not be required related to COVID-19.

Vehicles and collections operations

As noted in section 4 of this document, the requirement for Social Distancing has now been removed from UK government workplace guidance, and in some cases from public health advice (devolved nations may differ in detail and timescale). However, it has been replaced with the concept of 'reducing social contact' to lessen the risk of transmission. How and to what extent you react to this change is a matter for your risk assessment and will depend on your specific circumstances and nature of operation.

> **Note** – the advice given below applies to both household/domestic and commercial/industrial waste collection services.

Based on your assessment, you may wish to consider:

- Providing alcohol or soap-based cleansing and/or wipes in cabs for use on surfaces periodically throughout the day and at the end of each shift. Cleaning is good practice in any case and should include attention to door handles, hand holds/rails, dashboards, steering wheels, hand-brake levers, gearbox and other controls and indicator stalks etc. Do not forget external touch-surfaces such as lifting equipment and compaction control panels, buttons, and levers
- Where fitted, 'pop-up' sinks on waste collection vehicles should be subject to the same rigorous cleaning regimes as for any other welfare facility. Where pop-up sinks are fitted, disposable paper towels or similar should be available to dry hands
- Where a vehicle may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the vehicle should cleaned thoroughly (consider the advice at https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings or https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/)
- Collection operations may result in contact with members of the public/customers. To reduce social contact you may wish to instruct employees not to interact directly and physically with the public/customers
- There is some evidence that aggressive and potentially violent behaviour by the public may have increased over the pandemic. All such cases must be reported, and operatives informed to contact the police immediately if they are threatened. As is the case for any assault on a worker consideration should be given their mental and physical wellbeing including referral to counselling or medical services as appropriate

- Safety precautions which would normally be taken, such as the use of respiratory protection during the collection of waste which is particularly dusty must be maintained
- Normal monitoring processes to check crews are following good standards of safety should be continued, including hygiene practices and glove-use
- Normal precautions aimed at reducing the risk of 'sleepers in bins', and hazardous items in waste streams, such as gas cylinders, should be maintained

Despite the removal of Social Distancing from workplace guidance, to reduce social contact you may still wish, based on your assessment, to:

- Reduce the number of persons who share cab space. For example, in some areas it might be possible for crews to travel independently to an area and work as a group to fill RCVs that are sent with individual drivers, and which go off to tip sequentially as they are filled and return. It is recognised, however, that there will be cases where such alternative methodologies cannot reasonably practicably be used. Where this is the case the primary control method is to maintain high standards of hygiene
- Minimise the time spent in shared cabs
- Where alternative methods either of transporting employees to collection points, or collection, is used suitable and sufficient measures should be in place to ensure that employees still have access to soap and water, alcohol-based sprays or wipes and other materials for them to be able to maintain a high standard of hygiene
- Where minibuses and similar are used to ferry employees to collection areas they should be subject to the same cleaning processes as given above for lorry cabs (the same would apply to shared vans, cars etc used to ferry employees)
- Where practical maintain consistent crew rosters (same crew in each team every day) and minimise close interactions between crews. It is recognised that absence, practicalities, crew competency requirements and other factors may limit the extent to which this is possible
- If safe to do so, crews may be dropped-off outside waste management sites so that only the driver proceeds to tipping areas before picking the crew up on the way out
- Open cab windows to encourage airflow – there is firm evidence to suggest that good ventilation is a critical control in situations such as shared cabs. Even in poor weather cab windows should be partially open sufficient to encourage good airflow (for an example of practice see: https://www.letsrecycle.com/news/latest-news/cab-ventilation-key-to-reducing-covid-transmission/)

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> **Note** – waste collections and locations vary widely. For example, the size of vehicle (and often therefore cab) used in a medieval town centre will likely be smaller than used in a suburban area. Likewise, the number of crew need to safely transport the waste to the vehicle may vary dependent on local circumstances and waste collection methodology. As a result, no fixed minimum or maximum number for cab occupancy can be given.

Where multiple-person crews are being used and lorry cabs are being shared, if a member of a crew develops the symptoms of COVID-19, or they contact their manager/supervisor to state that they have developed symptoms (in addition see section 4 above of the NHS 'test and trace' scheme):

- The cab should be cleaned (see link above for considerations). If a crew member develops symptoms partway through the working day, this should be done immediately even if it means aborting the collections round
- The crew member showing symptoms must be sent home immediately and instructed to follow government guidance
- All crew members **MUST** immediately wash their hands thoroughly
- If at all reasonably practicable the remaining crew should not be allocated to a different crew, nor should a crew member from a different crew be allocated to fill the gap left by the person who has developed symptoms. The time period for this type of restriction, seven, 10 days or longer, will depend on the situation. The principles in the links given above in section 4 under test and trace may assist in informing employers regards an appropriate time period for restrictions
- Reinforcement instruction on precautions such as maintaining good hygiene should be conducted for all crews

If the above hierarchy of considerations is followed, required measures taken, and good hygiene practices enforced, the residual risks to employees will be minimised and will be low.

Some organisations have fitted Perspex, or similar screens in vehicle cabs (see section above under change management). Specific to cabs (and other vehicles such as crew minibuses), and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- The material used should be appropriate to reduce risks such as the screen shattering in the event of a road traffic collision producing shards which may cause injury
- The blocking of or impeded access to safety critical controls

- Distortion of driver vision resulting from an installed screen
- Screens should be subject to the same cleaning regime as the rest of the cab
- Emergency escape from the cab
- Advice should be sought from the vehicle manufacturer/supplier or a suitably qualified and experienced vehicle engineer to ensure critical safety aspects are not compromised

Discussion – WISH receives information from various private and public sources. While these do not cover 100% of the industry, such information does provide a good 'snap-shot' and likely represent as good a view of the industry as any. To date, while individual cases and some likely non-work-related outbreaks at waste sites, have been recorded, WISH is only aware of a few work-related outbreaks of COVID-19 across the entire industry during the pandemic so far. This is including in waste collections involving shared cabs. This is not to say that the risk does not exist, and operators need to consider controls such as hygiene and ventilation, such as always keeping windows open in shared cabs.

Bulky waste collections

Concerns have been raised about the risks associated with the collection of soft furnishings, mattresses, and similar items as part of bulky waste collections.

Such items have the potential to be contaminated with a wide range of insects, parasites, and potentially harmful organisms many of which survive longer in the environment than coronaviruses. Existing risk assessments for the collection and handling of such items should have considered this potential and identified controls. This might include wearing gloves and other protective equipment. Plus, instructions that where such bulky waste items are dusty or shedding large numbers of fibres precautions should be taken which might include the damping of the waste with water or a disinfectant and/or the wearing of suitable RPE (respiratory protection).

Mobile plant

Based on your assessment, you may wish to consider:

- Having alcohol- or soap-based cleansing spray and/or wipes available in cabs for periodic cleaning of surfaces throughout the day and especially at the end of each shift. Door handles, hand holds/rails, dashboards, steering wheels, controls etc should be paid particular attention to

- Where an item of plant may have been used by someone displaying the symptoms of COVID-19, or a confirmed case, then the plant should either be decontaminated thoroughly (see advice as above) or if this is not reasonably practicable parked up for a minimum of 72 hours
- Considering, if reasonably practicable, dedicating plant operators to one item of plant, or limiting the number of operators using an individual item of mobile plant

Comment – there have been news stories regarding alcohol-based hand sanitiser catching fire in hot weather. The National Fire Chiefs Council has published information refuting these reports and confirming that there have been no such cases but advocating keeping bottles closed and out of direct sunlight. See: http://www.nationalfirechiefs.org.uk/News/debunking-the-myth-hand-sanitiser-in-cars-do-not-pose-a-fire-risk-

Transfer stations, MBT, EfW, AD, landfills and similar
Based on your assessment, you may wish to consider:

- Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. For example, to minimise face-to-face contact – stay in mobile plant where reasonably practicable, keep mobile plant windows closed, and if you must speak directly to avoid physical contact

MRFs and recycling plants
Based on your assessment, you may wish to consider:

- Issue of instructions to site employees aimed at reducing the risk of transmission from those third parties using sites. Minimise face-to-face contact – keep mobile plant windows closed, and if you must speak directly to avoid physical contact
- Picking cabins may be an issue because of their enclosed nature and proximity of pickers to each other – consider rearrangement of the work to allow every other waste chute to be used, staggered on each side of the picking belt, to reduce social contact. If fewer people are picking from a line, slowing-down conveyor speed may need to be considered
- Access and egress from cabins may also need to be considered, such as operatives entering and leaving one-by-one to avoid the need for people to pass near each other (save for in emergency situations such as a fire where the normal rules will still apply)
- Glove use should be reinforced for those working in picking cabins (see section above on gloves for detail of glove use)

Some organisations have fitted Perspex, or similar screens in picking cabins/lines (see section above under change management). Specific to picking cabins/lines, and in addition to the general design risk assessment requirements noted in the section above on change management, the following should also be considered:

- Access to critical safety provisions must not be impeded or restricted by the installation of screens. For example, easy access to 'pull-wire' emergency stop cords
- Any modification to or change of location of critical machinery safety provisions must be carefully risk assessed before being carried-out to ensure that access and effectiveness is not compromised. For example, the relocation of a pull-wire emergency stop cord to a less easily accessible position to facilitate the installation of screens, or a change in the 'run' of cords which may compromise their effectiveness
- Emergency escape from the cabin/line
- Potential interference with any fixed fire systems such as sprinklers (where fitted)
- Ability and access to clean the screen/s (screens should be subject to the same cleaning regimes as other equipment)

Recycling plant workers undertaking sampling and testing duties, such as for quality control and regulatory reasons, should already be working under appropriate controls, including adequate PPE. These controls should be maintained, and risk assessments relating to such duties reviewed in the light of COVID-19 to ensure they remain appropriate.

While mandating of face-coverings has ceased in England (check on current rules if you have operations in Scotland or Wales), the use of face-coverings, masks, and gloves by the public is likely to remain high for some time. The vast majority of masks, gloves etc. are not recyclable and may compromise the quality of recycling waste streams. Used masks, gloves etc. should be disposed of into residual waste bins/bags by the public, but this may not always be the case. If recycling plant operators start observing significant amounts of used masks, gloves etc. appearing on picking lines and similar, they should discuss the issue with their client. Public communications and education campaigns and publicity may be required to encourage used PPE to be disposed of into residual waste streams.

CA/HWRC sites

CA/HWRC sites are places where members of the public may meet in numbers. This may pose additional risks. Based on your assessment, you may wish to consider:

- Issuing instructions to site employees aimed at reducing the risk of transmission from third parties using sites. For example, minimise face-to-face contact and if you must speak directly avoid physical contact to reduce social contact
- To reduce social contact, issuing instructions to not assist members of the public with wastes (note – most CA/HWRC sites are contracted to local authorities and contact should be made with the authority as regards such measures)
- Cleaning items such as handrails on access steps to containers and other frequently touched surfaces and items frequently

Note – more than most other waste management operations CA/HWRC sites involve members of the public. As such there may be a temptation to 'mix' public health and workplace requirements, such as applying an easing in public health restrictions to what is still a workplace. As for other waste management operations, at CA/HWRC sites workplace guidance such as the updated HSE advice (see section 4) should still be adhered to.

Welfare facilities

Based on your assessment, you may wish to consider:

- Reducing social contact by staggering rest breaks. For example, the number of people using welfare facilities could be limited, or where capacity is limited operating a "one in, one out" situation
- Ensuring that rest areas are thoroughly cleaned after rest breaks and other uses (for example morning brief and afternoon debrief sessions). This would be good hygiene practice in any case
- Ensuring that all surfaces, crockery, cutlery, touch surfaces etc are thoroughly cleaned/washed after use and surfaces cleaned periodically throughout the day. Again, this would be general good hygiene practice in any case
- Promoting hand washing and the provision of wipes and/or sanitisers (note – the provision of soap or similar and hot/warm water is a legal requirement)
- Keeping windows in welfare facilities open to encourage a good flow or air and ventilation
- Smoking areas are often also social gathering points. Staggering rest periods can assist to reduce social contact

It is common for waste management sites to provide toilet and other welfare facilities to visiting drivers and collection crews. HSE has reiterated that all drivers must have access to welfare facilities in the premises they visit as part of their work (see: https://www.hse.gov.uk/coronavirus/drivers-transport-delivery.htm). Preventing access is against the law and equally it is not the sensible thing to do. Those who already provide reasonable access to toilets and handwashing facilities should continue to do so, although measures such as providing alternative temporary facilities may be considered. With the latest advice for hands to be washed regularly, failure to allow access to welfare facilities may increase the risk of the COVID-19 infection spreading. Please note that the general precautions, such as hygiene, apply equally to all on site including third parties.

Weighbridges

Based on your assessment, you may wish to consider:

- Keeping weighbridge windows facing drivers closed
- Keeping other windows open to promote good ventilation
- Installing transparent shields, as at some supermarket check-outs, although these should not be relied on as the sole control being used
- If paperwork needs to be exchanged, use of impermeable gloves, along with frequent washing of hands by weighbridge staff. Where temporary regulatory relaxations (see note box below) have been put in place and as a result no paperwork exchange or other contact with shared items such as single digital signature pads are required, glove use may be relaxed, although frequent hand washing will still need to be maintained as good hygiene practice
- If still in use, the frequent cleaning and disinfecting of shared items such as digital signature pads, pens, clipboards and similar

Note – over the course of the pandemic, various temporary regulatory statements relating 'duty of care' have been released by regulators. You are advised to keep up to date and to check if these still apply. If in doubt, contact your environmental regulator.

Maintenance, repair, workshops and similar

While the requirement for Social Distancing has been removed from workplace guidance it has been replaced by the concept of reducing social contact. Some maintenance, repair, workshop, and similar tasks may present issues with this, such as two-person operations. Based on your assessment, you may wish to consider:

- Does the task really require two-person working, or could the use of mechanical handling and similar equipment remove the need for two-person working
- Can the work method be rearranged to remove the need for two-person working?
- Reducing the duration of any required two-person working to the minimum consistent with maintaining good levels of safety
- Where two-person working is really required ensuring that the same two persons are used for such tasks and that 'teams' are not mixed routinely (that is maintain the same cohorts for tasks)
- Consider fresh air/ventilation, either through general ventilation or other. For example, performing any required two-person task outside instead of indoors, or ensuring good ventilation of the work area

7. Other information and links

General links

- https://111.nhs.uk/covid-19
- https://www.nhsinform.scot/self-help-guides/self-help-guide-coronavirus-covid-19
- https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection
- https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19
- https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings
- https://www.ecdc.europa.eu/en/factsheet-health-professionals-coronaviruses

Links to devolved administration web sites

- https://www.hps.scot.nhs.uk/a-to-z-of-topics/covid-19/
- https://www.gov.scot/collections/coronavirus-covid-19-guidance/
- https://www.hps.scot.nhs.uk/web-resources-container/covid-19-guidance-for-non-healthcare-settings/
- https://www.gov.scot/coronavirus-covid-19/
- https://www.gov.scot/publications/coronavirus-covid-19-returning-to-work/
- https://phw.nhs.wales/topics/latest-information-on-novel-coronavirus-covid-19/
- https://gov.wales/taking-reasonable-measures-minimise-risk-exposure-coronavirus-workplaces-and-premises-open-public

RIDDOR reporting and COVID-19

The links below provide information on the reporting of COVID-19 and RIDDOR:

- https://www.hse.gov.uk/coronavirus/riddor/index.htm
- https://www.hse.gov.uk/coronavirus/riddor/riddor-reporting-further-guidance.htm#disease-law

Disclaimer and WISH

This information document has been prepared by health and safety practitioners to assist health and safety improvements in the waste management industry. It is endorsed by the WISH (Waste Industry Safety and Health) Forum. This information document is not formal guidance and represents good practice, which typically may go beyond the strict requirements of health and safety law.

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The Waste Industry Safety and Health (WISH) Forum exists to communicate and consult with key stakeholders, including local and national government bodies, equipment manufacturers, trade associations, professional associations, and trade unions. The aim of WISH is to identify, devise and promote activities to improve industry health and safety performance.

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Appendix 1. Discussion and pros-and-cons of masks and face-coverings

This appendix is commentary/discussion and not a formal part of this information sheet. The aim is to outline potential considerations to assist employers when making their own decisions.

Regards face-coverings, their inclusion in the table below is for comparison purposes only and is not intended to imply that employers should provide such coverings for protection.

Regards RPE (respiratory protection)/face masks, HM Government advice states: "'*Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings*…". The inclusion of masks in the table below is not intended to imply that employers should provide them to protect against COVID-19 risks.

Note – the use of a face shield/visor has become popular for some people. The evidence is that these provide little protection and should not be used on their own. See: https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own, which includes the statement: "*A face visor or shield may be worn in addition to a face covering but not instead of one. This is because face visors or shields do not adequately cover the nose and mouth*".

Whether RPE (respiratory protection) is required, or not, is a matter for risk assessment. The use of face-coverings is, largely, a personal choice. If, based on their assessment, an employer issues RPE they attract responsibilities for the standard of the RPE, its use, cleaning, replacement, fit-testing etc. Face-coverings are not produced to a formal standard, are not RPE, and employers should not issue face-coverings to their employees as protection. However, if an employee decides to wear their own face-covering, employers should support them in this.

The 'pros-and-cons' of coverings and masks for various issues, such as fit, comfort in use, effectiveness, hygiene and similar are included in table 1 below. For waste management activities, hygiene in use is of specific importance. By their very nature, many wastes are contaminated by hazardous substances and/or biological agents and such contamination may transfer to gloves, surfaces and similar. Waste management activities may be described as occurring in a 'dirty environment', no matter how good housekeeping and cleaning are. The cleaning of hands and removal of gloves before putting-on and taking-off RPE/masks and face-coverings is essential to avoid the potential transfer of contamination from hand/glove to RPE/covering, where it can be inhaled. Likewise, if RPE/coverings are left on contaminated surfaces, kept in pockets, or similar, the risks of the RPE/face covering becoming contaminated increases.

Working in waste management is not the same as working in a shop or bank. RPE/face-covering use is likely to require more rigorous hygiene standards. These need to be enforced, and more frequent replacement and/or cleaning is likely to be necessary. As a result, and the difficulties there are in meeting them in waste and recycling collection settings, there is a potentially higher risk of failure of RPE/face-covering to control the risk, or potentially even to increase risk. Waste management employers need to take this into account and should be wary of transferring practice from other sectors which may not have such potentially high hygiene issues.

In specific circumstances, face-coverings may provide a level of source control. If a person is asymptomatic, or has yet to develop symptoms, wearing a face-covering may reduce their broadcast emission of aerosols, to an extent. This may provide some level of protection for other persons they come into contact with (if they are showing symptoms, they should be self-isolating and not in close contact with any other person in any situation). This may be of use in internal spaces where reducing social contact may be difficult, and where multiple people are present – the more people the higher the risk. In external spaces, unless people are in prolonged very-close proximity such as a dense crowd, natural ventilation etc are likely to be more effective.

Considering the above, and from a workplace perspective, the use of face-coverings by members of the public in retail premises might help to protect shop workers who work indoors and can come into close proximity to 100s of different people a day, or transport workers likewise. Taxis may be another example. Face-coverings use by 'fares' could provide some degree of help in terms of protecting a taxi driver who may come into close proximity in their cab with dozens of different people a day.

Obviously, household waste collection is not a retail outlet, and the actual collection takes place outdoors where adequate reduction in social contact between crew and members of the public can be maintained. The collection crew themselves are only exposed to other crew members and not multiple other people. In addition, the considerations listed in section 6 of this information note, such as reducing time spent in shared cabs and maintaining consistent crews, can reduce risk further. A weighbridge where multiple third parties need to enter a weighbridge office in which reducing contact may be problematic might be a different case. First other controls, such as modifying the office so that third parties do not need to enter or conducting any required business outside of the office need to be considered. If this is not reasonably practicable the use of face-coverings by these multiple third parties, in conjunction with good hygiene and other measures, may have a benefit, although this would be a matter for specific assessment by the employer.

The above are only examples and thoughts. The aim is to illustrate that waste management employers need to consider carefully what happens in other sectors. There may be lessons which can be learnt and transferred, but what works in one setting may not work in another and may potentially in some cases result in an increase in the level of risk. Employers have the duty to assess their own specific situations – the above, and table below, are not intended to be guidance but may assist.

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Table. Pros-and-cons summary

Face-coverings (snoods, homemade and other masks, including surgical 'looking' masks, NOT manufactured to a formal standard)	Surgical masks (manufactured to the appropriate EN or similar formal standard)	Higher-protection RPE (FFP2/3 masks or equivalent manufactured to formal standards)
PROs		
May provide a level of source control (may provide limited protection for persons other than the wearer)	May provide a level of source control (may provide limited protection for persons other than the wearer)	Higher filtration level provides effective protection for wearer (provided fit-tested and used correctly)
Cheap, can be homemade and easily available online or from various retailers	Constructed to formal recognised, consistent standards	Made to recognised, consistent standards, including being subject to testing and quality regimes
Dependent on construction, can be fairly comfortable to wear for longer periods of time	Looser fitting and usually more comfortable to wear than higher-protection RPE	Proven performance in reduction of inhalation of bioaerosols including viruses when worn and fitted correctly
Some research indicates may improve behaviour in other areas such as hygiene and distancing	Some research indicates may improve behaviour in other areas such as hygiene and distancing	
CONs		
Do not protect the wearer effectively (see above – may be useful as a source control, which is a different matter)	Do not protect the wearer effectively from smaller sized aerosols (designed to protect from larger droplets)	If fitted with a one-way, unfiltered exhalation valve do not protect persons other than the wearer effectively
Typically, loose fitting resulting in gaps through which aerosols/virus can pass	Fairly loose fitting resulting in gaps through which aerosols/virus can pass	Relatively expensive, particularly in times of shortage
Inadequate filtration to provide significant protection to wearer and often worn incorrectly	Inadequate filtration to provide significant protection to wearer and often worn incorrectly	Require face-fitting and training to be effective
Much research over years indicates may result in wearers not following more effective controls such as hygiene and distancing	Much research over years indicates may result in wearers not following more effective controls such as hygiene and distancing	Tight fitting so prolonged use (>1 hour typically) can be uncomfortable. Very prolonged use of non-powered RPE can be harmful
Often worn incorrectly	Widespread use may result shortages in sectors which really need this level of protection, such as healthcare	Widespread use may result in shortages for those who need this level of protection, such as healthcare workers, those exposed to bio-aerosols in waste management etc
Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)	Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)	Hygiene issues (of specific importance in waste activities as a result of potentially 'dirty' working environments)
Some evidence aerosols can be trapped on/in face-covering and so be inhaled and re-inhaled	Disposal issues as generally worn once and discarded rather than cleaned	Misunderstanding over how many times such RPE can be re-used