

Covid-19 hazards and controls

Considerations for ongoing review of risk assessments in prison education

This document aims to list some of the potential hazards related to Covid-19 transmission in the workplace and some potential control measures that should be considered for prison education where there is move towards increased face-to-face work or on-site presence.

The list is not exhaustive and you will need to identify hazards and controls specific to your organisation and the people working there. Generic and specific Covid-19 risk assessments should reviewed and amended in consultation with UCU whenever there is a significant change that could increase risks in the workplace. This could include but is not limited to, changes in the delivery model and any changes in infection rates in the prison or wider community. As emerging evidence of Covid-19 transmission risks develops, employers should review whether their risk assessments remain effective at reducing risks to lowest level practicable.

Control measures should always follow a **hierarchy of control** that first seeks to eliminate or avoid a foreseeable risk and where this is not possible, control the hazard to reduce the risk the lowest level possible.

Who can be harmed and how

When considering the risks of Covid-19 transmission in the workplace, certain groups of staff are at greater risk and will need specific considerations and specific control measures implemented. Emerging evidence on groups at increased risk of Covid-19 is developing all the time and as such a precautionary approach should be taken by employers.

Employers risk assessments, safe systems of work (SSOW), information, guidance and training should be easy to understand and implement. Employers should ensure staff understand what hazards and risks they face and the measures in place to control these risks, including any emergency procedures.

Everyone should be clear on what they need to do to keep themselves and others safe and this will require high levels of communication, frequent and meaningful consultation with UCU and ongoing monitoring and review of risk assessments.

Hazards and hazardous activities	Potential controls
<p>Wing work</p> <p>Delivery of learning packs to wings or individual cells</p> <p>Face-to face discussions with learners</p>	<p>SSOW for undertaking wing work and prison SOP</p> <p>Social distancing of 2 metres plus in wings to be maintained at all times with particular attention to narrow corridors and welfare facilities.</p> <p>Safe routes through the wing that also ensure 2 metres plus social distancing to be identified in SSOW</p> <p>Sign in with wing office on arrival and check in with officers before entering wing to ensure prisoners will remain in cells during visit. Ensure sign out at wing office on departure.</p> <p>Where no officers present in wing office, visit should not proceed.</p> <p>Wing visits to be undertaken in staff pairs from same staff 'bubble'</p> <p>Officer awareness and supervision of education staff on the wing during visit</p> <p>Minimise time spent on wing and minimise interactions with others.</p> <p>Minimum safety standards and refresher training undertaken – SSOW for wing visits and HMPPS Safe Operating Procedure (SOP) for wings visits.</p> <p>Staff to carry radio where appropriate to ensure that they have a personal alarm (where applicable). Staff should be radio trained and have a designated radio.</p> <p>Manual handling considerations (see below)</p> <p>SSOW for the storage of learning packs for delivery or collection must include a minimum quarantine period.</p>

Hazards and hazardous activities	Potential controls
	<p>Gloves to be worn when handling materials such as learning packs. Access to hand sanitiser and SSOW for use of PPE.</p> <p>Wing work to cease where there are potential COVID cases on site amongst learners/ prisoners or staff until consultation with UCU and confirmation that risks are low enough to resume wing work.</p> <p>Staff and UCU to be made aware of any suspected and confirmed cases of infection without delay to ensure appropriate safety measures are in place and any safety concerns addressed.</p> <p>Any face to face communication to be done with minimum 2 metres social distancing and for a limited time only (i.e. no more than 15 minutes).</p> <p>Visits to multiple wings in any given time period to be avoided to ensure protection of staff 'bubbles' and to minimise potential transmission risks or 'super spreader' incidents.</p> <p>Respiratory protective equipment to be worn at minimum standard FFP2 face masks (PPE Regs apply) at all times when on the wing.</p> <p>Clear signage on wings to ensure adherence to safety instructions.</p> <p>Access to bins, sanitation stations and hand gel on wings.</p> <p>Voluntary work on wings or opt out measures for staff who feel unsafe working on the wings.</p> <p>Staff with higher individual risk factors should avoid undertaking work on the wings.</p> <p>Where vaping is an issue on the wing, review arrangements to identify a vape/smoke free area to undertake work tasks.</p>

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<p>Manual handling - wing work</p> <p>Staff risk injuries or back pain from handling heavy/bulky objects e.g. deliveries of paper or boxes to wings</p>	<p>Separate manual handling checklist in place for staff to complete to identify any potential risks that need to be controlled (e.g. carrying heavy load, carrying a load for long distances, a load that is difficult to grasp, difficult for those with health issues, difficult when wearing PPE etc.)</p> <p>Access to information and training on safe manual handling as appropriate.</p> <p>Access to equipment (such as trolleys) where applicable.</p> <p>No person to carry more than is comfortable or safe.</p> <p>Pack sizes are reduced to the lowest practicable amount.</p>
<p>Work on site</p> <p>Group teaching</p> <p>1:1 teaching or support work</p> <p>Meetings</p> <p>Administrative tasks</p>	<p>Phased return to teaching for all (where there has been a significant break in teaching delivery) which also takes account of current Covid-19 transmission risk levels.</p> <p>Minimise amount of time spent on site.</p> <p>Implement new ways of working to reduce the number of activities or teaching hours on site.</p> <p>Restrict numbers working on site at any one time (rotas, staggered start times, staggered breaks).</p> <p>Reduce social mixing - maintain social bubbles for staff and learners.</p> <p>Reduce contact with other people as much as possible.</p> <p>Agree maximum numbers in bubbles at each education EDM level – as agreed with UCU.</p> <p>Any activities that can be undertaken off site should be (e.g. use of online meeting platforms or teleconferencing, administrative tasks, lesson planning etc.)</p>

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	<p>Non-essential activities should not take place on site – exceptions should be agreed on a case by case basis with UCU.</p> <p>Ensure adequate cleaning and hygiene measures in place to prevent contact transmission (see cleaning controls below).</p> <p>Introduce barriers and protective screens where 2 meters social distancing could be breached (e.g. reception desks, workshops).</p> <p>Reconfigure office or classroom spaces to ensure social distancing of 2 metres minimum and ensure staff or students are sitting side to side, or back to back, avoiding face-to-face set ups where possible.</p> <p>Ensure adequate ventilation on site to prevent airborne transmission (see ventilation controls below).</p> <p>Maximum room capacity agreed and clearly displayed on entry. Room capacity to be based upon various risk factors including airborne transmission risks and the need for social distancing and well ventilated spaces.</p> <p>Identify safe routes through buildings, corridors and rooms and safe use of any shared facilities or communal areas (e.g. kitchens, printing rooms). Ensure minimum 2 metres social distancing in place at all times including considerations of potential bottlenecks or queuing.</p> <p>Ensure safe access and egress measures in place across the workplace for each room or building utilised by staff and learners. This should also take account of additional transmission risks.</p> <p>Reduce usage of shared equipment or desks – assign own equipment, restrict access, ensure cleaning of shared equipment between users.</p>

Hazards and hazardous activities	Potential controls
	<p>PPE/ RPE (FFP2 respirators) - Safe system of work required for safe usage or disposal.</p> <p>Mandatory use of Fluid Resistant Face Masks (FRSM) - IIR standard surgical masks) by all staff and learners in education settings.</p>
<p>Inadequate ventilation</p> <p>Impact of colder weather</p> <p>New technologies</p>	<p>Utilise those work spaces with more efficient ventilation systems in place as a priority for on-site work.</p> <p>Identify higher risk activities that could lead to greater risk of airborne transmission (e.g. singing, teaching/ talking) and ensure well ventilated spaces are used for these activities.</p> <p>Reduce occupancy levels to reduce airborne transmission risks in indoor spaces.</p> <p>Increase ventilation by following HSE, CIBSE and SAGE advice. In a normal office environment a minimum of 10l per person per second. If talking loudly or singing this should be increased to a minimum of 15l per person per second.</p> <p>Seek expert advice and undertake ventilation checks to ensure maintenance, output and safe usage of ventilation systems which takes into account guidance issued for ventilation systems during Covid-19 (SAGE, HSE, CIBSE).</p> <p>Use of NDIR Co2 monitors in all spaces used –appropriate usage needs to be considered e.g. suitable positioning of sensors in rooms (CIBSE guidance).</p> <p>Balance ventilation requirements with thermal comfort. Anticipate behavioural hazards where thermal comfort is an issue and windows are closed.</p> <p>Poorly ventilated spaces – one in one out, enhanced cleaning and spend no longer than 15 mins inside if used by multiple persons (e.g. toilet or other welfare facilities).</p>

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	<p>When establishing a safe fresh-air supply rate to consider: floor area per person, the processes and equipment involved and whether the work is strenuous.</p> <p>Room layout - increasing the distance of occupants from openable vents gives more time for incoming cool air plumes to mix with warm room air prior to entering the occupied zone.</p> <p>Identify activities where there is potential for long duration exposure over several hours (e.g. offices, classrooms). Occupants should have regular breaks, ideally with purge ventilation/airing of the room, to reduce the potential for viral exposure.</p> <p>Heating design in most buildings should account for adequate ventilation rates (as per the Building Regulations), but additional measures may need to be taken in some buildings to ensure that spaces are adequately heated.</p> <p>Warm clothing – relax dress codes where necessary to increase thermal comfort.</p> <p>Use respiratory protective equipment (minimum FFP2 respirators to protect individuals from airborne transmission).</p> <p>Mandatory use of FRFM (IIR surgical masks) by all staff and learners in indoor settings.</p>
<p>Inadequate cleaning</p> <p>Shared responsibilities of HMPPS and education provider</p>	<p>Agreement with HMPPS and education provider on cleaning regime at different delivery levels to ensure contract transmission risks remain low.</p> <p>Scenario based cleaning reflected in cleaning regime (e.g. regular cleaning schedules, ad hoc cleaning, cleaning after suspected cases of Covid-19).</p> <p>Restrict access to potentially contaminated areas to be restricted access until deep cleaned (See govt. guidance).</p>

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	<p>Thorough cleaning of all areas at least twice per day with one clean at start of end of the working day and ad hoc cleans throughout working day.</p> <p>Cleaning regimes agreed and implemented (including details of who undertakes cleaning, of which areas, how often and what times during day).</p> <p>Agree cleaning arrangements at each stage of delivery.</p> <p>Cleaning schedules attached to each risk assessment and published for all staff.</p> <p>COSHH risk assessment for cleaning as applicable.</p> <p>Monitoring and checks in place to ensure adherence to schedule and quality of cleaning.</p> <p>Increase how often and how thoroughly you normally clean the workplace, as well as cleaning surfaces that you do not normally clean.</p> <p>Implement HSE and government guidance on cleaning and hygiene during the coronavirus outbreak.</p> <p>Identify surfaces that are frequently touched and by many people (often common areas), e.g. handrails, door handles, vehicle door handles (inside and outside), shared equipment etc. and specify the frequency and level of cleaning and by whom.</p> <p>Avoid use of shared equipment and clean equipment before and after usage and between users.</p> <p>Follow SSOW to decontaminate or quarantine any items that may contain viable virus e.g. paper based assessments and learning packs.</p> <p>SSOW in place for cleaning and the safe storage, use and disposal of cleaning materials.</p>

Hazards and hazardous activities	Potential controls
	Identify system to ensure cleaning materials are well stocked and regularly replenished.
<p data-bbox="172 418 571 562">Staff at increased risk of contracting Covid-19 or suffering serious ill health</p> <p data-bbox="172 602 576 808">Staff with underlying medical conditions (many in this category will also be disabled staff due to nature of their medical condition)</p> <p data-bbox="172 853 512 887">Older age groups (40+)</p> <p data-bbox="172 931 576 1010">Staff from Black, Asian, Minority Ethnic backgrounds</p> <p data-bbox="172 1055 320 1088">Older Men</p> <p data-bbox="172 1133 376 1167">Pregnant staff</p>	<p data-bbox="608 418 1437 533">Home-working and flexible working arrangements in place to minimise time spent on site and contact with other people.</p> <p data-bbox="608 577 1382 611">Alternative duties to allow for increased homeworking.</p> <p data-bbox="608 656 1382 689">Lower risk on-site activities with safe systems of work.</p> <p data-bbox="608 734 1350 857">Encourage staff to disclose any issues and offer reassurance that support can be given to prevent or minimise impact on health and safety.</p> <p data-bbox="608 902 1406 981">Individual risk assessments for all staff at increased risk of contracting Covid-19.</p> <p data-bbox="608 1025 1366 1104">Review of individual reasonable adjustments and any other additional support needed.</p> <p data-bbox="608 1149 1430 1305">Workforce planning to identify those staff and students at greater risk and for this data to inform return to work plans (e.g. lower risk groups phased back to the workplace before higher risk groups).</p> <p data-bbox="608 1350 1190 1384">Lone person working to be risk assessed.</p> <p data-bbox="608 1429 1382 1507">Priority access to RPE and PPE (FFP3/2 respirators, IIR face masks, gloves, aprons. SSOW in place.</p>
Stress	<p data-bbox="608 1543 1358 1621">Measures implemented to avoid or mitigate potential stressors in the workplace.</p> <ul data-bbox="608 1666 1430 1744" style="list-style-type: none"> <li data-bbox="608 1666 1430 1700">■ Generic stress risk assessment in place (preventative). <li data-bbox="608 1711 1430 1744">■ Individual stress risk assessments in place (reactive).
Inadequate safety measures or poor adherence levels	<p data-bbox="608 1812 1437 1980">Escalation process in place to ensure staff can alert managers to urgent safety concerns that need to be addresses immediately (e.g. serious and imminent danger procedure, escalation procedure).</p>

Hazards and hazardous activities	Potential controls
<p>Reporting health and safety risks</p> <p>Following escalation procedures</p>	<p>Management to encourage formal reporting of any hazards or near misses in the work place. Management to have a simple and accessible system in place to report the above – e.g. accident book.</p> <p>Investigations undertaken to identify safety issues and address them in timely, effective way.</p> <p>Increase management supervision, monitoring and auditing of safety measures in the workplace.</p> <p>Regular reporting of data on near misses and incidents to safety committee. Safety committee to develop an action plan for continuous improvement of safety in the workplace.</p>
<p>Safety culture and behaviour of staff and students</p>	<p>Take actions that will increase motivation to follow safe systems of work such as additional training, inductions, safety checks, supervision.</p> <p>Promote understanding of health and safety arrangements and why they are in place.</p> <p>Review and agree wider employment protections to make safety and safe behaviour a realistic prospect (e.g. not detriment or loss of pay for all staff ill with suspected Covid-19 symptoms, for staff isolating, caring for dependants).</p> <p>Utilise a range of communication methods to suit different groups.</p> <p>Identify areas where additional training, information and instruction are required and consider use of signage throughout workplace to support implementation of various control measures.</p>
<p>Person becomes ill with Covid-19 symptoms on site</p>	<p>Ensure immediate and safe isolation of symptomatic person to minimise transmission risks.</p>

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	<p>Staff to be aware of safe system(s) of work in place for learners and for employees who become ill on site.</p> <p>Anyone who has been in close contact with symptomatic person 2-3 days before their symptoms began should isolate for 14 days following NHS guidelines.</p> <p>First Aiders to be provided with personal PPE Kits for emergency usage. First aiders should try to maintain safe distancing where possible as protective equipment may not be readily available.</p> <p>Employer to provide additional information and training to first aiders to avoid Covid-19 transmission.</p>
Personal hygiene	<p>Ensure system in place for adequate supply and replenishment of hand washing or sanitising materials.</p> <p>Ensure sufficient cleaning stations or supply of sufficient materials to staff for individual use.</p> <p>SSOW for use of sanitation stations, welfare facilities and use of hand sanitiser/alcogel.</p>
Use of PPE and RPE	<p>IIR/FRSM masks should be mandated for all education staff and learners in education.</p> <p>Any work with any amount of time spent at less than 2 metres social distancing requires use of FFP2 respirators.</p> <p>On site work - vulnerable staff given priority access to FFP2 RPE as a minimum standard.</p> <p>Ensure adequate supply, adequate fit testing and RPE and PPE that is suitable for each person.</p> <p>Identify alternative PPE or RPE where problems are identified for users.</p> <p>Workers must be trained in the function and limitation of each item of PPE.</p>

Additional information

Transmission routes

Respiratory transmission	When people sneeze, cough, talk, breathe
Airborne transmission	Fine particles that can stay suspended in the air for hours and can travel with air currents across tens of feet.
Contact transmission	Contact with contaminated surfaces that can enter the body through eyes, mouth or nose.

Outbreak scenarios

There are a range of outbreak scenarios that will require appropriate actions and review of delivery/risk assessments.

Definitions for confirmed or suspected cases of Covid-19 (see: Covid-19 Contain Framework)	
Case	Refer to individual case of Covid-19
Cluster	Refers to 2 or more cases associated with a specific setting but there is no evidence of a common exposure or link to another case
Outbreak	2 or more confirmed cases associated with a specific setting with evidence of a common exposure or link to another case.
Community spread	Refers to sporadic or linked cases on a limited or extensive basis.

Outbreak criteria for prisons

Two or more test-confirmed cases of Covid-19 or clinically suspected cases of Covid-19 among individuals associated with a specific setting with illness onset dates within 14 days.

Note: *If there is a single test-confirmed case, this would initiate further investigation and risk assessment. An outbreak would be declared if the investigation ascertained a second Covid-19 case (test-confirmed or clinically suspected).*

End of outbreak

No test-confirmed cases with illness onset dates in the last 28 days in that setting.

(see: **Covid-19 definitions of outbreaks and clusters in particular settings**)

Other resources

Ventilation

<https://www.hse.gov.uk/coronavirus/equipment-and-machinery/air-conditioning-and-ventilation.htm>

<https://www.cibse.org/coronavirus-covid-19/emerging-from-lockdown>

<https://www.gov.uk/government/publications/emg-role-of-ventilation-in-controlling-sars-cov-2-transmission-30-september-2020>

Outbreak management

<https://www.gov.uk/government/publications/covid-19-epidemiological-definitions-of-outbreaks-and-clusters/covid-19-epidemiological-definitions-of-outbreaks-and-clusters-in-particular-settings>

<https://www.gov.uk/government/publications/containing-and-managing-local-coronavirus-covid-19-outbreaks/covid-19-contain-framework-a-guide-for-local-decision-makers>