



Covid-19: Guidance on Good Manufacturing Practice 2nd Edition



BPF Health & Safety Committee

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Contents

The Safe Continuation of Business	2
Hygiene/Sanitisation	2
Testing for High Temperatures	3
Social Distancing	3
Changeover Times and Staff Interaction	3
What about visitors to my site?	4
Working from Home	4
Response to Suspect Case.....	5
RIDDOR reporting of COVID-19.....	5
What to report	5
Make a RIDDOR report online	6
Authorisation to Work	6
HSE	6
Policy Making	7
COVID-19 Risk Assessment	8
Appendix A	14
Useful Links.....	14

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The Safe Continuation of Business

The government has repeatedly made clear that it is **“not asking all businesses to shut – indeed it is important for business to carry on”**. Only some non-essential shops and public venues have been asked to close. In fact, on the 8 April 2020 the Rt Hon Alok Sharma MP Secretary of State Department for Business, Energy & Industrial Strategy wrote a letter to those working in manufacturing and industry in the UK, outlining the importance of supporting manufacturing supply chains and categorically stating that **“there is no restriction on manufacturing continuing under the current rules”**.

BPF have compiled the following guidance reflecting good manufacturing practice, which is based on and remains subject to changes from time to time to the UK government’s response to COVID-19 and guidance published by Public Health England. It takes the advice from Public Health England and practical experience from BPF members to identify ways in which mitigations may be employed in order to keep our employees safe whilst continuing production. It should be used in a manner appropriate for the nature and scale of each business.

Hygiene/Sanitisation

Production sites are working hard to fit sanitising stations throughout their facilities and providing cleaning products for regular workstation cleansing. But you must ensure you have cleaning and sanitising chemicals which are certified as effective against enveloped viruses. EN 14476 is the standard for Chemical disinfectants and antiseptics effective against viruses. If your chemical does not have this certification, ask for validation for effectiveness against viruses.

Ensure personnel are trained to wash their hands for the required 20 seconds with soap and water; this is more effective than relying on sanitiser alone. Hand washing cannot happen often enough; this should be carried out by all staff after being in a public place, blowing their nose, coughing, and/or sneezing.

Identify key touch points (control panels, door handles, keypads, vending machines, etc) and ensure these are being cleaned and sanitised at an agreed frequency – minimum every 2 hours – and at the start and end of every shift.

Identify ‘common areas’ where there might be a high level of cross over, for example canteen areas; these areas should be cleaned with a viricidal cleaner between different groups of personnel.

Handling deliveries, post and packaging should be carried out according to existing risk assessments.

If a large percentage of your staff travel on public transport, consider implementing work clothes’ where staff change into clothes on arrival at your facility that they only wear at the facility and can then change into travel clothes when they are ready to leave – particularly shoes.

Assign a manager as your coronavirus ‘champion’ to make sure that employees are following procedures.

Further advice:

<https://www.gov.uk/government/news/public-information-campaign-focuses-on-handwashing>

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

Testing for High Temperatures

The most common symptoms of COVID-19 are a new continuous cough and/or a fever/high temperature (37.8C or greater). If you have a high temperature – this means you feel hot to touch on your chest or back.

Those with a high temperature must seek a second measurement.

Anyone with a confirmed high temperature must leave the site immediately and follow the National Health Authority guidelines

Further advice:

<https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested>

<https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested#regional-testing-sites>

Social Distancing

Social distancing measures are steps you can take to reduce social interaction between people. Workplaces need to avoid crowding and minimise opportunities for the virus to spread by maintaining a distance of at least 2 metres (3 steps) between individuals wherever possible. Additionally staff should work facing away from each other rather than face-to-face.

Some of the strategies adopted by the UK plastics industry include:

- Asking staff to communicate via email or telephone where possible
- Reduced internal meetings, or better still, carried out via video conferencing
- No desk sharing
- All business travel prohibited
- Time gaps between shifts so that production teams have no opportunity to meet
- Staggered break times
- Employees must only handle their own food stuff
- There must be no communal food (biscuits, cakes, etc.) brought onto site
- Production lines rearranged to keep staff 2 metres apart
- Diverting plant walkways to outdoor routes
- One-way walkways
- Wherever possible, admin staff should work from home

Further advice:

<https://www.hse.gov.uk/news/social-distancing-coronavirus.htm>

Changeover Times and Staff Interaction

Reducing staff interaction reduces the chances of the virus spreading between your staff members and lowers the possible impact on your business:

- Stagger changeover times between shifts as much as possible, so there is less intermingling.
- Comprise your shifts of the same people; try to prevent people swapping shifts. This will mean that a staff member who catches the virus is less likely to spread it across multiple teams in your business.
- Staff to keep a 2m distance from one another when working wherever possible.
- Discourage staff from entering parts of your site unless essential to their role.
- Where admin staff are unable to work from home, 'shuffle' departments; if your office is laid out in sections then mix up your teams so that if one person in sales goes down, they don't take the entire sales team with them.
- Ban handshaking in the office.

- Rotate lunch and break times to avoid large gatherings.
- Encourage staff to bring in their own food and to minimise use of communal kitchens.
- Where there are no practical alternatives workplace canteens can remain open to provide food for their staff and/or provide a space for breaks, the government has confirmed in further guidance. Measures should be taken to minimise the number of people in the canteen at any one given time, for example by using a rota.
- If you are limiting production, then it could be possible to do one of two things:
 1. Where possible, assign different shifts different machines to lower the opportunity for coronavirus to be transmitted via surfaces.
 2. If reduced capacity will mean shutting down some machines entirely then you can ramp up your cleaning regime on the machines you will be using.

What about visitors to my site?

Communication with your customers and suppliers is key. There should be no real need for external visitors to come to your place of business for a meeting. Digital meeting platforms are in common use in business and now, more than ever, provide an essential tool for collaboration, not only with your supply chain but for internal team meetings.

Drivers for collection & delivery should be forbidden to enter any building with the exception of accessing facilities. A sign off procedure should be in place (and forewarned to all drivers) for all deliveries/collections that ensures 2m social distancing and sanitation guidance.

Working from Home

WFH can seem like a benefit to some, but it can present real challenges: homelife distractions, managing your time effectively and feelings of isolation.

It is important that home workers begin their day as if preparing for work. Get up, shower and dress – i.e. sitting around all day in your pyjamas is unlikely to make you feel professional and ready for business. Additionally, it could give colleagues/customers a shock during video conferencing!

Once ready for work, make sure you have a dedicated workspace in your home. Not everyone will have a home study so try to find a corner where you're least likely to be disturbed and where you can keep everything you need to carry out your duties.

Remember when organising your home workstation the same occupational health requirements that are in effect at your office should still apply: desk set-up, laptop position/monitor height, comfortable chair, etc.

When your work is done, it's done. In other words, keep to your normal working hours. This is your home, so when your day normally ends, put away your workstation and go back to your homelife.

Manage distractions. They're going to happen so accept it and have a strategy for dealing with them. The best way to overcome distractions is to have a to-do list and stay organised. If you need 10 minutes to reset, go right ahead. Then go back to your list.

Take a break (different from distractions). Take several breaks. You should leave your desk once an hour. We are not designed to sit all day so get up and stretch your legs around the house. You need to stay hydrated too, so go to the kitchen and fetch a glass of water. We work more efficiently when refreshed. And don't forget to have lunch, the same way you should were you at the office.

Even if you live alone, you will have colleagues working from home too and dealing with the same issues. Use instant messaging platforms to check in with them, collaborate, or just say 'Hi'.

Further advice:

<https://www.hse.gov.uk/toolbox/workers/home.htm>

Response to Suspect Case

The most common symptoms of COVID-19 are a new, continuous cough or a high temperature. For most people, COVID-19 will be a mild infection.

If becoming unwell whilst at work, with a new, dry, continuous cough or high temperature the colleague must be sent home and follow the advice to self-isolate at home.

If a colleague is contacted whilst at work and advised they are a primary contact of a confirmed case, they should be sent home.

On identifying a 'presumed positive' case of Covid-19, on site consideration must be given to the risk to others and the risk of contamination of the environment. If someone helps the ill person to leave site, there is no need for them too to be sent home, but they must wash their hands with soap and warm water for at least 20 seconds after touching the affected individual or their belongings and then sanitise their hands.

The minimum PPE to be worn for cleaning an area where a person with possible or confirmed coronavirus (COVID-19) is disposable gloves and an apron. Hands should be washed with soap and water for 20 seconds after all PPE has been removed.

If a risk assessment of the setting indicates that a higher level of virus may be present or there is visible contamination with body fluids, then the need for additional PPE to protect the cleaner's eyes, mouth and nose might be necessary. The local Public Health England (PHE) Health Protection Team (HPT) can advise on this.

Employees are entitled to time off work to help someone who depends on them (a 'dependant') in an unexpected event or emergency. This would apply to situations related to coronavirus (COVID-19). For example:

- if they have children they need to look after or arrange childcare for because their school has closed
- to help their child or another dependant if they're sick, or need to go into isolation or hospital

Further advice:

<https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms-and-what-to-do/>

RIDDOR reporting of COVID-19

You must only make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when:

- an unintended incident at work has led to someone's possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence.
- a worker has been diagnosed as having COVID 19 and there is reasonable evidence that it was caused by exposure at work. This must be reported as a case of disease.
- a worker dies as a result of occupational exposure to coronavirus.

What to report

Dangerous occurrences

If something happens at work which results in (or could result in) the release or escape of coronavirus you must report this as a dangerous occurrence. An example of a dangerous occurrence would be a lab worker accidentally smashing a glass vial containing coronavirus, leading to people being exposed.

Cases of disease: exposure to a biological agent

If there is reasonable evidence that someone diagnosed with COVID-19 was likely exposed because of their work, you must report this as an exposure to a biological agent using the case of disease report. An example of a work-related exposure to coronavirus would be a health care professional who is diagnosed with COVID-19 after treating patients with COVID-19.

Work related fatalities

If someone dies as a result of a work-related exposure to coronavirus and this is confirmed as the likely cause of death by a registered medical practitioner, then you must report this as a death due to exposure to a biological agent using the 'case of disease' report form. You must report workplace fatalities to HSE by the quickest practicable means without delay and send a report of that fatality within 10 days of the incident.

Make a RIDDOR report online

To make a RIDDOR report of COVID-19 online there are three categories of reporting. The links for each categories are as follows:

- Report a dangerous occurrence - <https://notifications.hse.gov.uk/riddorforms/DangerousOccurrence>
- Report a case of disease: exposure to a biological agent – <https://notifications.hse.gov.uk/riddorforms/Disease>
- Report a work-related fatality due to exposure to a biological agent – <https://notifications.hse.gov.uk/riddorforms/Disease>

Authorisation to Work

We are aware that staff at some member companies have been stopped on the way to work by police asking if their journey is necessary. In the event of this occurrence, your staff should be equipped with a Work Authorisation Letter to show to law enforcement agencies if questioned. The letter should be addressed to the member of staff stating why they are engaged in essential work and that it is not possible to be carried out remotely at home.

Each manufacturer is singly responsible for remaining fully informed about current best practice and always exercising judgment in its workers' interests and welfare before adopting guidance in its own business.

You should ensure that you keep everyone updated on actions being taken to reduce risks of exposure in your workplace.

HSE

As Britain's statutory regulator of occupational health and safety The Health and Safety Executive (HSE) has taken action to ensure that their role continues effectively as the COVID-19 situation unfolds. These actions are being guided by the specific needs and characteristics of the various sectors that they regulate and in line with advice from the UK Government, Public Health England, Public Health Wales and Health Protection Scotland.

As a consequence, HSE:

- has suspended targeted inspection activity of high-risk industries that are not part of the major hazard sectors, including construction and manufacturing
- has carried out a short pause on offshore oil and gas and onshore chemical, explosives and microbiological industry inspection activities to give duty holders time to overcome various immediate pressures and challenges and we will then focus our regulatory work so it is re-prioritised onto critical areas and activities.

- will continue to regulate major hazard industries throughout this time undertaking regulatory functions remotely
- will endeavour to undertake regulatory activities which do not require site visits as normally as possible, for example Approvals and Authorisation work for biocides and pesticides, Statutory Permissioning activities such as Licensing, Safety Case/Report Assessments, Thorough Reviews, Combined Operations Notifications, Wells Notifications, Land Use Planning Applications, Hazardous Substances Consents etc
- will, across all sectors, continue to investigate work related deaths, the most serious major injuries and dangerous occurrences and reported concerns from the workforce or the public where people are being exposed to risks from work activities, while taking action to secure compliance with the law.
- conduct as much investigation activity using technology as possible, without compromising the collection of evidence and the ability to secure effective control of risk and, where appropriate, justice
- will do as much regulatory intervention work as possible remotely, but will still mobilise to site, including offshore, where it's necessary to provide public assurance that hazards are being effectively managed and to secure compliance with the law. Where a site visit is required social distancing guidelines will be followed.

Policy Making

Government policy changes with the escalating scale of the coronavirus; meaning that you will be required to review your company actions at the same rate. **With every new business decision made in response to COVID-19 you are strongly advised to document the date of the action, the rationale behind it and the Government guidance to which the change follows. In this way you will protect the business against legal scrutiny once the pandemic is over.**

COVID-19 Risk Assessment

Where it is not possible to follow the social distancing guidelines in full in relation to a particular activity, you should consider whether that activity needs to continue for the business to continue to operate, and, if so, take all the mitigating actions possible to reduce the risk of transmission between staff.

Like all risk management, a risk assessment should be carried out before you decide to continue production. The following is a draft copy of a generic Risk Assessment for dealing with the current Covid-19 situation in the workplace. It is not likely to cover all scenarios and each employer should consider their own unique circumstances. Much more specific assessments, such as that for health care workers, may look quite different although many of the principles would still be relevant.

What are the Hazards?				
Spread of Covid-19 Coronavirus				
Who might be harmed?				
<ul style="list-style-type: none"> • Staff • Visitors to your premises • Cleaners • Contractors • Drivers • Vulnerable groups – Elderly, Pregnant workers, those with existing underlying health conditions • Anyone else who physically comes in contact with you in relation to your business 				
Controls required	Additional controls	Action by who?	When?	Done
Hand Washing <ul style="list-style-type: none"> • Hand washing facilities with soap and hot water in place. • Stringent hand washing taking place. • Paper towels/hand driers for drying of hands • See hand washing guidance. • https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/ • Gel sanitisers in any area where washing facilities 	<p>Employees to be reminded on a regular basis to wash their hands for 20 seconds with warm water and soap and the importance of proper drying. Also reminded to catch coughs and sneezes in tissues – Follow Catch it, Bin it, Kill it and to avoid touching face, eyes, nose or mouth with unclean hands. Tissues will be made available throughout the workplace.</p> <p>To help reduce the spread of coronavirus (COVID-19) reminding everyone of the public health advice - https://www.publichealth.hscni.net/news/covid-19-coronavirus</p> <p>Posters, leaflets and other materials are available for display.</p>			

not readily available	https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19			
Cleaning Frequently cleaning and disinfecting objects and surfaces that are touched regularly particularly in areas of high use such as door handles, light switches, reception area using appropriate cleaning products and methods.	Rigorous checks will be carried out by line managers to ensure that the necessary procedures are being followed.			
Social Distancing Reducing the number of persons in any work area to comply with the 2-metre (6.5 foot) gap recommended by the Public Health Agency Take steps to review work schedules including start & finish times/shift patterns, working from home etc. to reduce number of workers on site at any one time. Also relocating workers to other tasks. Redesigning processes to ensure social distancing in place. Conference calls to be used instead of face to face meetings. Ensuring sufficient rest breaks for staff with social distancing also to be adhered to in canteen area and smoking area.	Staff to be reminded on a daily basis of the importance of social distancing both in the workplace and outside of it. Management checks to ensure this is adhered to.			

<p>Wearing of Gloves</p> <p>Where Risk Assessment identifies wearing of gloves as a requirement of the job, an adequate supply of these will be provided. Staff will be instructed on how to remove gloves carefully to reduce contamination and how to dispose of them safely.</p>	<p>Staff to be reminded that wearing of gloves is not a substitute for good hand washing.</p>			
<p>RPE</p> <p>Public Health guidance on the use of PPE (personal protective equipment) to protect against COVID-19 relates to health care settings. In all other settings individuals are asked to observe social distancing measures and practice good hand hygiene behaviours</p> <p>Where RPE is a requirement for risks associated with the work undertaken the following measures will be followed-</p> <p>Tight-fitting respirators (such as disposable FFP3 masks and reusable half masks) rely on having a good seal with the wearer's face. A face fit test will be carried out to ensure the respiratory protective equipment (RPE) can protect the wearer. Wearers must be clean shaven.</p>	<p>To minimise the risk of transmission of COVID-19 during face-fit testing the following additional measures should be carried out –</p> <p>Both the fit tester and those being fit tested should wash their hands before and after the test.</p> <p>Those being fit tested with non-disposable masks should clean the mask themselves before and immediately after the test using a suitable disinfectant cleaning wipe (check with manufacturer to avoid damaging the mask).</p> <p>Test face pieces that cannot be adequately disinfected (e.g. disposable half masks) should not be used by more than one individual.</p> <p>Fit testers should wear disposable gloves when undertaking cleaning of the tubes, hoods etc. and ensure they remove gloves following the correct procedure (PDF)</p> <p>Reference: https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm</p> <p>Internal communication channels and cascading of messages through line managers will be carried out regularly to reassure and support employees in a fast-changing situation.</p>			

<p>Symptoms of Covid-19</p> <p>If anyone becomes unwell with a new continuous cough or a high temperature in the workplace they will be sent home and advised to follow the stay at home guidance.</p> <p>Line managers will maintain regular contact with staff members during this time.</p> <p>If advised that a member of staff or public has developed Covid-19 and were recently on our premises (including where a member of staff has visited other work place premises such as domestic premises), the management team of the workplace will contact the Public Health Authority to discuss the case, identify people who have been in contact with them and will take advice on any actions or precautions that should be taken. https://www.publichealth.hscni.net/</p>	<p>Line managers will offer support to staff who are affected by Coronavirus or has a family member affected.</p>			
<p>Drivers</p> <p>Procedures in place for Drivers to ensure adequate welfare facilities available during their work - Reference</p>	<p>Communicate with companies we deliver to/from to ensure welfare facilities will be available to our drivers. Allowing delivery drivers adequate breaks to avail of proper welfare facilities.</p>			

https://www.hse.gov.uk/news/drivers-transport-delivery-coronavirus.htm COVID-19-guidance on freight transport. Persons should not share vehicles or cabs, where suitable distancing cannot be achieved.				
<u>Mental Health</u> Management will promote mental health & wellbeing awareness to staff during the Coronavirus outbreak and will offer whatever support they can to help Reference - https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing/	Regular communication of mental health information and open-door policy for those who need additional support. Additional checks/communication for those working from home.			

Further advice:

<https://www.hse.gov.uk/news/work-equipment-coronavirus.htm>

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Appendix A

Useful Links

BPF COVID-19 site - <https://www.bpf.co.uk/coronavirus/guidance-main.aspx>

[Government social distancing advice](#) for employers to follow in the workplace

[Further government guidance](#) for employers, businesses and their staff on staying safe during the coronavirus including advice on shift patterning and staff canteens.

[Health and Safety Executive coronavirus guidance](#)

[Health and Safety Executive plant and equipment examination guidance](#)

[RIDDOR reporting of the coronavirus](#)

[Government FAQs on the coronavirus](#)

[Government information for NI businesses and employers](#)

[Government information for Scottish businesses](#)

[Government information for Welsh businesses](#)

Coronavirus and your wellbeing - <https://www.mind.org.uk/information-support/coronavirus-and-your-wellbeing/>

British Safety Council Useful information for employers - <https://www.britsafe.org/about-us/useful-information-for-employers-and-employees-about-the-coronavirus/>

Fit testing face masks to avoid transmission during the coronavirus outbreak - <https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm>

Construction Leadership Council - <https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2020/04/Site-Operating-Procedures-Version-3.pdf>



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