**Covid-19 Safe Operating in Shops FAQ**

**Explanatory operational support FAQ’s**

*A supplementary guide for retailers on how to implement Government advice*

*Version 3: 25th June 2020*

**SAFER WORKING FREQUENTLY ASKED QUESTIONS**

The safety and wellbeing of every retailers’ staff and customers is a top priority. Retailers welcome continued government support and clarification to assist managing their workforces.

The Government updated its [Guidance and support for businesses and self-employed people during coronavirus. Working safely during coronavirus (COVID-19)](https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/shops-and-branches)

[Working safely during COVID-19 in shops and branches](https://assets.publishing.service.gov.uk/media/5eb9703de90e07082fa57ce0/working-safely-during-covid-19-shops-240620.pdf)

It is an unavoidable fact that products will be handled, by store staff when placing them on the shelf, by customers when browsing and inspecting. We have worked with BRC members to provide guidance to customers and stores to minimise the exposure to coronavirus.

**Explanatory operational support notes**

**Proportionate, reasonable controls need to be in place to manage the risk of covid 19.**

The government objectives are:

• To minimise the contact resulting from visits to stores or outlets.

• To keep the workplace clean and prevent transmission by touching contaminated surfaces.

• To minimise the risk of transmission through customer fitting rooms.

• To reduce transmission through contact with objects that come in the store.

* To help workers delivering to other sites such as factories, logistics sites or customers’ premises to maintain social distancing and hygiene practices.
1. **Disinfectants and Sanitiser**

**Are retailers providing sanitiser for customers at store entrances?**

Most business have a cleaning station at the store entrance. This may include hand sanitiser and if trollies or baskets are used wipes or disinfectant spray to sanitise handles.

**Have there been any sourcing issues?**

We are not aware of any current shortages but maintain dialogue with your supplier as this can fluctuate.

**What is the risk of cross contamination?**

Current government guidelines suggest that Coronavirus can survive outside a host for 48 hours. However, this will differ depending on the type of surface. We have sought guidance from government on how this could affect day to day tasks like trying on garments, jewellery and clothes.

1. **Social Distancing**

**How are businesses calculating the number of customers that can safely shop?**

There is no definitive answer to this and will depend on several factors including:

* Store format
* Layout
* Number of tills available
* Consideration of high traffic areas
* Number of members of staff

**How do businesses maintain compliance with the social distancing guidelines (2m, or 1m) with risk mitigation where 2 m is not viable (England only)**

Please note that Public health is devolved in Northern Ireland, Scotland, and Wales, where 1m has not been adopted.

Where the social distancing guidelines cannot be followed in full for an activity you should

consider whether that activity needs to continue for the business to operate, and, if so, take all the mitigating actions to reduce the risk of transmission. Mitigating actions include:

* Further increasing the frequency of hand washing and surface cleaning.
* Keeping the activity time involved as short as possible.
* Using screens or barriers to separate people from each other.
* Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.
* Reducing the number of people each person has contact with by using ‘fixed teams or partnering’ (so each person works with only a few others).

Where you have a primary authority relationship it is advisable to agree your capacity calculations with your PA. This can be agreed as assured advice.

**What advice is available for small store formats, <1500 sq. ft?**

Government advice is that “all employers are expected to follow social distancing guidance. Where the production environment makes it difficult to do so, employers should consider what measures may be put in place to protect employees. Once staff have left the work areas, social distancing and further hand washing guidance should be adhered to.”

There is also recognition that “the practical implementation of this advice will depend on the local circumstances.” The guideline goes on to acknowledge the need for a local management assessment of measures that can be implemented.”

It is advisable for small stores to consider a number of measures including; restricting numbers of customers where necessary and mange flow of people in high traffic areas. Some businesses currently open have an extra member of staff on the door and in much smaller stores maximum numbers entering at one time is being managed through the use of very clear signage at the entrance ie only one or two people allowed at one time.

**How are businesses in local areas and shopping centres anticipating managing queues outside multiple businesses?**

Managing people flows around high streets, town centres and shopping centres sits with the Local Authority or Landlord covering the area. The government has issued Safer Public Places Guidance on 13 May [here](https://www.gov.uk/guidance/safer-public-places-urban-centres-and-green-spaces-covid-19). It is expected that individual retailers will be responsible for managing their own customers and the related queuing that may exist outside their store. Obviously, this will require a local approach of collaboration with neighbouring retailers. Government has recognised that all public spaces and high streets are different and have varying space available. In the event of a dispute between business owners over contested space, they are asking business owners to contact their local authority, or in privately owned or operated public spaces, the relevant organisation, to help resolve any dispute.

1. **Handling and Trying on Goods**

**CHANGING ROOMS: The government guidance says changings rooms should be closed wherever possible, does that mean we HAVE to close them?**

* The guidance allows you to make safe alternative arrangements, but you may be called upon to demonstrate they are safe and to make this clear in your covid-19 risk assessment. If you have a Primary Authority it can provide business specific advice.
* Unless you can clean down the touch points in a fitting room after every use, on top off a regular deep cleansing programme, then fitting rooms should be closed wherever possible given the challenges in operating them safely.
* Essential workers trying on PPE can continue to use changing rooms and will require a surface clean down between use.
* You should consider a colleague in place to ensure social distancing is maintained

**The government guidance says items that have been extensively handled, for example tried on jewellery should be stored separately for 48 hours or cleaning such items with usual cleaning products, before displaying them on the shop floor. How do we decide when to store them or clean them?**

* The touching of items is part of the customer shopping experience; however, customers should be encouraged not to handle goods when browsing unless there is an intention to buy.
* Customers should be invited to sanitise their hands before entering the store, or prior to the handling of goods.
* In the absence of scientific evidence, the government has taken the precautionary principle approach. You may choose to set aside, sunglasses, wigs, toys etc. that have been tried on for a period of 48 hours before returning to the shop floor. This may change with time as further evidence becomes available.
* Items that have hard non-absorbent surfaces like plastic or metal be able to be sanitised and placed back on sale. This is unlikely to apply to textiles and leather.
* Materials used for cleaning can be disposed of normally.

**CLOTHING: The government guidance says items that have been extensively handled, for example tried on clothes should be stored separately for 48 hours or cleaning such items with usual cleaning products, before displaying them on the shop floor. How do we decide when to store them or clean them?**

* The touching of items is part of the customer shopping experience; however, customers should be encouraged not to handle goods when browsing unless there is an intention to buy.
* Customers should be invited sanitise their hands before entering the store, or prior to the handling of goods.
* In the absence of scientific evidence, the government has taken the precautionary principle approach. Clothing. that has been tried on should be set aside for a period of 48 hours before returning to the shop floor. This may change with time as further evidence becomes available.
* Items that have hard non-absorbent surfaces may be able to be sanitised and placed back on sale. This is unlikely to apply to clothing.
* Materials used for cleaning can be disposed of normally.

**FITTING: The Government Guidance says limit contact between customers and colleagues during fitting, for example by suspending fitting assistance**.

* Social distancing between customers and colleagues during fitting needs to be maintained, where this cannot be achieved the relevant PPE may need to be provided, otherwise the fitting assistance may need to be suspended.
* Where customers require specialist advice/assistance in store, ensure colleagues giving the advice have a clearly designated position, ideally with a secure barrier as provided at till points.

**RETURNS: When would it be possible to return goods that have been returned by customers to the shop floor rather than storing them separately for 48 hours?**

* Items that have hard non-absorbent surfaces may be able to be sanitised and placed back on sale. This is unlikely to apply to clothing and textile based products.

**HANDLING GOODS: The government guidance encourages retailers to discourage customers from handling goods. How does this work in a clothing, accessories, or footwear shops?**

* The touching of items is part of the customer shopping experience; however, customers should be encouraged to refrain to handle goods when browsing unless there is an intention to buy.
* It could be possible to ask people to refrain from touching if they are not seriously considering making a purchase.
* The whole aim across the board is to reduce risk and not to eliminate it – and in this washing hands is the most important.
* Customers should be invited sanitise their hands before entering the store, or prior to the handling of goods.

**FURNITURE & BEDS: The government guidance says items that have been extensively handled, for example tried on clothes should be stored separately for 48 hours or cleaning such items with usual cleaning products, before displaying them on the shop floor. How do we decide when to clean them?**

* The touching of these types of items is almost unavoidable as part of the customer shopping experience.
* Customers should be invited to sanitise their hands before entering the store, or prior to the handling of goods.
* Consider placing protective coverings on large items that may require customer testing or use.
* Ensure frequent disposal or cleaning of these coverings between uses, using usual cleaning products. Materials used for cleaning can be disposed of normally.
* Consider disposable coverings on items that make direct contact with the face e.g. bed pillows
1. **PPE and Face Coverings**

**What is PPE?**

PPE is equipment that will protect the user against health or safety risks at work. In everyday circumstances it can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. It also includes respiratory protective equipment (RPE). Current government advice is that PPE is not required outside of clinical and care settings. However, businesses have found that the provision of items including masks, shields and gloves has helped allay any concerns among the work force. Where this equipment is provided it is important to provide guidance and instruction to ensure that it is used properly and its use does not compromise adherence to the key control advice issued by government. This is to stay at home if displaying symptoms, practice good hand hygiene and maintain a 2m distance from people you do not live with.

**What types of masks are there?**

There are two different groups for respiratory protection (all should be CE marked):

**Respirators**

Have to be [fitted](https://www.hse.gov.uk/news/face-mask-ppe-rpe-coronavirus.htm) properly and professionally to the user before use. These are based on a grading system which specifies how much protection they offer.

FFP3 (European standard) respirators filter 99% of particles. FFP2 respirators are specified to filter 94% of particles.

The N99 (American standard) respirator is an alternative to the FFP3 and also filters 99% of particles. An N95 respirator is specified to filter 95% of particles and is a close equivalent to the FFP2.

Current NHS guidelines stipulate FFP3 respirators for virus and bacterial infection control when the contagion is spread through coughing and sneezing (such as with the coronavirus). These are the ones used by frontline clinicians providing close contact care to confirmed Covid19 patients on the ward or ICU.

**Face Masks**

The Type IIR (European Standard) fluid resistant surgical mask is the “regular” surgical mask often used in clinical settings, often a four-ply construction.

Type II Standard, 3 ply construction can sometimes be used the difference being the lower level of fluid resistance and bacterial filtration.

Primary care health professionals are advised to wear the Type IIR where social distancing cannot be maintained due to the risk of being in close contact for a prolonged period with patients.

**Face Coverings**

Any type of covering that is not PPE or CE marked e.g. cut up t-shirt, sock, scarf etc, and may be worn in enclosed spaces where social distancing is not possible and should cover your mouth and nose. It is not the same as a face mask.

Government advice is that there are some circumstances when wearing a face covering may be marginally beneficial as a precautionary measure. Evidence suggests that wearing a face covering does not protect you, but it may protect others if you are infected but have not developed symptoms.

**What types of masks are therefore being used by retailers?**

It is NOT Government guidance to require any form of PPE in non-clinical workplaces. Businesses should undertake a risk assessment as per health and safety legislative requirements to confirm which type of mask is necessary. Most businesses are providing gloves, masks and/or face guards to those that request them.

When using gloves hands should still be washed regularly and the wearer should avoid touching their face. Visors or shields should be cleaned frequently before, during and after use and should be reused only by the same individual.

Businesses that are suppling masks for general use and making these available on a voluntary basis will need to determine their own policy for accompanying user information. It is important to ensure that enough are available for changes where necessary. Anytime a mask is removed by the user, a new mask should be put on before returning to work.

Businesses that are supplying masks tend to be sourcing the type II 3 ply mask tested to EN14683 standard, this is not medical grade.

There have been recent examples of fake products being distributed and purchasers should ensure that the products you are being supplied with have the right certification.

Businesses should not rely on face coverings alone as part of their risk management. Which should include minimising time spent in contact, using fixed teams and partnering for close-up work. It is important to use face coverings properly including:

* Washing hands before putting them on and before and after taking them off.
* Change your face covering if it becomes damp

Shields/Visors

Some businesses have provided their staff with polycarbonate face shields/visors. These cover the whole face including eyes. These are a sustainable option compared to masks as they can be kept by an individual cleaned and reused.

**How are masks being disposed?**

If your risk assessment confirms the need for masks due to direct contact with individuals infected with Covid-19 then this should be treated as clinical waste.

Non-clinical use of masks should be disposed of as normal.

**Is PPE being provided for customers?**

Not that we are aware of. Some businesses are providing hand sanitiser and surface wipes at store entrances. It is advisable to have posters in prominent areas to remind customers to stay at home if displaying symptoms and to remind people of the general hygiene rules around hand washing etc. Government [guidance](https://www.gov.uk/government/publications/staying-safe-outside-your-home/staying-safe-outside-your-home#face-coverings) has been issued which acknowledges that face coverings may offer some protection from transmission by asymptomatic carriers. These are not masks and staff should be prepared for some customers to be wearing these. It is also possible that some staff may choose to wear these to and from work.

**Are there any sourcing issues?**

We understand that there is a steady supply of non-medical grade masks. However, there are also recent instances of fake PPE being [sold](https://www.bsigroup.com/en-GB/about-bsi/media-centre/press-releases/2020/february/warning-fake-certificate-for-medical-face-masks/).

1. **Deliveries and Installations**

**DELIVERIES: The government guidance says that workers delivering to other sites such as factories, logistic sites or customers’ premises should maintain social distancing and hygiene practices. How do we accomplish this without compromising health and safety?**

* Remove vulnerable colleagues from these roles as it is impossible to maintain 2m distancing
* Vehicles: drivers to keep the same one if possible, with regular cleaning of touch points.
* Equipment - sack barrows, shoulder dolly’s, tools etc - users keep the same ones, regular cleaning programme in place.
* Ensure provision of hand sanitiser, wipes, blue roll etc
* Customers must inform if they are self isolating and consider whether delivery should proceed.
* Ensure customers are clear about service being offered - room of choice / doorstep only and what they need to do i.e. inform if they are isolating etc.
* Include a clause, and brief those delivering that if they do not feel safe to complete a delivery then they do not need to.
* Remove need for physical signature
* Call ahead to customer when en route - verify not sick / isolating, reminder about social distancing, keeping doors open & ventilation during on site delivery and installation
* Wash hands / sanitise before & after installation work
* Consider if job allocation times need to be adjusted to take changes in procedures into account

**Two man deliveries**

As for deliveries except:

* Roster same pairs together wherever possible
* Consider face coverings & glasses for 2-man lift due to <2m proximity and potentially face to face and breathing hard through physical exertion.
* Consider a partition in the cab where it can still be driven safely, otherwise provide PPE or ask them to travel separately
* Windows should be open to ensure ventilation
* Clean cab thoroughly between each crew.

**ENTERING PEOPLES HOMES: The government guidance says that workers delivering to other sites such as factories, logistic sites or customers’ premises should maintain social distancing and hygiene practices and reduce transmission due to face-to-face meetings and maintain social distancing. How do we accomplish this?**

* Ensure customers are clear with the service being offered - room of choice and what they need to do i.e. inform if they are isolating etc. You may need to leave the delivery outside.
* Call ahead to customer when en route - verify not sick / isolating, reminder about social distancing, keeping doors open & ventilation during delivery
* If the person delivering feels their safety is compromised they should feel safe in refusing to enter.
* Wash hands / sanitise before & after delivery

**INSTALLATION / ASSEMBLY SERVICES: The government guidance says that workers should maintain social distancing and hygiene practices and reduce transmission due to face-to-face meetings and maintain social distancing. How do we accomplish this?**

* Ensure customers are clear with service being offered - room of choice and what they need to do i.e. inform if they are isolating etc.
* Include a clause, and brief those installing / assembling that if they do not feel safe to complete an installation at any time, then they don't need to.
* Remove need for signature
* Call ahead to customer when en route - verify not sick / isolating, reminder about social distancing, keeping doors open & ventilation during delivery and Installation
* Wash hands / sanitize before & after installation work
* If the person fitting / assembling feels their safety is compromised, they should feel safe in refusing to enter or remain
* Consider if job allocation times need to be adjusted to take changes in procedures into account

1. **Testing**

**Should we be making tests available to staff?**

Testing capacity has been expanded to allow anyone with symptoms to be tested in England and Wales and anyone over 5 with symptoms in Northern Ireland and Scotland. Click here for more [information](https://www.gov.uk/guidance/coronavirus-covid-19-getting-tested).

**Should we be temperature testing customers and staff?**

There is no government advice to suggest this is necessary. Several businesses have looked into the efficacy of temperature testing staff and are taking a cautious approach to its introduction. This is because there are concerns about the accuracy of results and acknowledgement that there are other causes of high temperatures. Also, some Covid-19 sufferers do not have high temperatures. However, we are aware of some businesses who do intend to temperature test using contactless thermometers their staff at the start of each shift.

1. **Risk Assessments and Liability**

**LIABILITY: What is the retailer’s Liability to employees and customers for coronavirus related issues?**

In the absence of any specific changes in the law, the situation would be the same for coronavirus as it would be for any other health and safety issue for any employer or business owner – be it in relation to shopworkers or office workers or members of the public visiting their premises.

Businesses have a duty of care to their employees and customers in stores under common law. Claims for compensation would arise if it can be shown that harm was caused as a result of a breach of this duty.

Under health and safety legislation, businesses are also under a duty to take steps, as far as reasonably practicable, to ensure the safety of anyone who may be placed at risk by their business activities (e.g. employees and customers in stores) Businesses are exposed to investigation and enforcement action (including prosecution with unlimited fines) if this duty is breached immaterial if whether or not actual harm is caused by the breach: the focus is on the risk of harm.

If an employee has an accident at work, or contracts a disease that the employee can show was a direct result of the work environment, businesses might, depending upon the circumstances, have a statutory obligation to report the matter (under RIDDOR) depending upon the specific circumstances. Further information is available on the HSE website in relation to reportable incidents.

All businesses should undertake a risk assessment in relation to the risk of coronavirus. This should identify everyone who is at risk throughout the business and set out the appropriate control measures to protect against this risk. Any existing risk assessments should also be reviewed as they might be impacted by any changes made to protect against the spread of coronavirus.

When considering appropriate control measures, businesses should take into account any legislation and Government guidelines; for example relating to: social distancing; capacity to work from home; capacity for safe travel to and from work; vulnerable/higher risk workers; cleaning and hygiene; what to do when someone is showing symptoms at work; and protective equipment. If there is any discretion in the guidelines (ie ‘wherever possible’) and they cannot be followed, the risk assessment should explain why not and evaluate the risks of not following the guidance. It might be that some tasks are cannot be performed safely and therefore should not be undertaken.

If an employee were to show symptoms of the disease or be diagnosed with the disease,

* retailers should consider how to address the situation in line with government guidance.
* Whether or not an employee would have a claim depends upon the steps taken by their employer to manage the risk which is addressed in the paragraphs above and also being able to establish that, on the balance of probabilities, infection arose from the workplace and the failure to manage the risk of infection.

In a store a customer can claim compensation for an accident – such as a trip or fall. It is possible that if a customer came into contact with an employee who had coronavirus and the customer could show on the balance of probabilities that the customer caught it from that employee they could have a case – probably easier if there were a cluster of cases linked to that employee but otherwise somewhat difficult in an epidemic. The retailer would then need to show it was taking all reasonable steps, in line with regulations and guidelines, to protect against this risk..

The retailer/employer would also need to check with their insurer to ensure they were covered for the specific situation of coronavirus (ie no exclusions) and if there were any specific requirements to be covered.