



# GUIDANCE Note

## Apprentices: work-related travel and onsite supervision

The following provides guidance for employers on how to enable apprentice travel and onsite activity - including site supervision and training - where 'close proximity' working (at less than the social distancing guidelines) may be required.

### 1. General Introduction

For any construction, maintenance or emergency call-out activity, employers must ensure that they protect apprentices and other employees from transmission of COVID-19, as far as reasonably practicable. Work on-site (and travel to, from and between sites) should only continue if:

- it can be carried out in line with relevant guidance issued by Public Health England (PHE);
- it can be undertaken without compromising wider safety and health.
- it is done in accordance with the latest government ('COVID secure') workplace guidelines and CLC Site Operating Procedure (SOP) - see 'Key Sources of Information and Advice'; and
- workers can travel safely and responsibly to sites.

Note that the government guidance says: "No one is obliged to work in an unsafe work environment" and this principle applies to any employee, for all work-related travel and activity.

The most effective ways to prevent the spread of coronavirus are:

- social distancing;
- thorough hand washing (using soap or sanitiser)
- workers avoiding touching their eyes, nose or mouth, and covering the mouth/nose when sneezing or coughing, and
- cleaning contacted surfaces and equipment (and not sharing items or equipment).

### Essential closer proximity activity

Regarding work-related vehicle travel or site activity, the Government guidelines say: "Where social distancing guidelines cannot be followed in full, for a particular activity, businesses should consider *whether that activity needs to continue* for the business to operate".

In relation to apprentices, examples of an employer's operational considerations may include:

- for capacity reasons, the employer relies on e.g. a final year apprentice to help carry out essential site tasks;
- sufficient progress with vocational training (individually or collectively) and the attainment of vocational qualifications are essential to the continued operation of the business;
- shared travel is essential to enable essential site work or training to occur; and/or
- some close proximity supervision is necessary in order to allow essential vocational training.

Where the activity *needs to continue* for the business to operate then an employer is required to “take all mitigating actions possible to reduce the risk of transmission between employees”, including the measures shown below, where reasonably practicable.

## 2. Work-related travel

The following relates to apprentices travelling to, from, or between sites, in order to continue with vocational training or site activity.

Any apprentice - or other employee - who has Covid-19 symptoms or has been in close contact with someone who is symptomatic, should *not travel to work by any method*.

### Planning apprentice travel

Plan ahead on how best to enable apprentices to get to the workplace. Look to avoid - and enable travel alternatives to - use of public transport and manage other work-related travel to reduce the risk of COVID-19 transmission. Communicate *as necessary* on planned travel arrangements with clients/main contractors and consult with the workers involved, including apprentices (and optionally with appropriate others - e.g. the apprentice’s parents).

When possible, and where it is safe to do so, apprentices should travel alone, using either a company or their own vehicle (all vehicles must be roadworthy and suitably insured) or another means of travel, such as a bike - but avoiding public transport (whether travelling alone or with others). However, it is understood that many apprentices may not be able to drive, or have access to transport from home, for significant journeys.

#### 1. Public transport

Staggering apprentice travel times and providing additional car parking or other facilities such as secure bike racks, may help apprentices to *avoid using public transport*.

Apprentices should only use public transport if their journey is essential, they have no other safe means of transport (see below), and the risk of transmission is sufficiently mitigated (e.g. by staggering travel times to enable social distancing). A suitable face covering must be worn on public transport.

#### 2. Single occupancy vehicles

Apprentices should travel alone (or arrange for safe travel from home) where possible. For single occupancy company vehicles that may subsequently be used by another occupant (even if they too will travel alone), an apprentice entering or leaving the vehicle should follow the steps shown below in ‘Cleaning Vehicles’.

However, some apprentices may need a lift to the workplace from *another employee*. See 'Shared Vehicles' Section below.

### **3. Shared vehicles**

If sharing a vehicle is essential, then avoid multiple vehicle occupancy (more than two occupants) where possible. Conduct a risk assessment, ensuring social distancing if possible (e.g. separating occupants to the maximum safely allowable in a vehicle and/or using a larger vehicle than usual, to achieve social distancing).

#### **Mitigating risk for essential, closer proximity travel**

If social distancing guidelines *cannot be followed* and the travel "needs to take place for the business to operate" then take 'all mitigating actions possible' to reduce the risk of COVID-19 transmission. Discuss the key findings of the risk assessment, and the intended mitigating measures, with the apprentice (and optionally with others, e.g. the parents). Ensure that your risk mitigation measures do not:

- create, or interfere with the control of, other significant health and safety risks, including vehicle occupant safety
- impact on vehicle insurance – check in advance before making any significant vehicle alterations.

Based on the risk assessment, mitigating actions may include the following:

- reduce the number and duration of shared journeys, wherever possible
- use a vehicle that allows spacing between occupants and/or limit the number of occupants – this may include leaving some seats empty, or worker distancing on bench seating
- enable workers to sit side-to-side (not passenger-facing) whenever possible
- reduce the number of workers in close proximity by using 'fixed pairs/teams or partnering' (so an apprentice works with only one other, or only a few others)\*
- use screens to separate workers from each other in the vehicle (e.g. clear, flexible lightweight plastic sheets)
- increase the frequency of hand washing and surface cleaning\*\*
- ventilation: increase the flow of fresh air (e.g. open windows) – do not recirculate vehicle air conditioning

Brief drivers and other occupants regularly on the need to implement the required behavioural measures.

#### **\*Pairing/teaming**

As far as possible, establish pairs, teams or shift groups so that where close proximity travel is unavoidable, it occurs between the same people. Those travelling together in a vehicle should be in a fixed pairing, as far as possible.

#### **\*\*Hygiene and cleaning**

Encourage apprentices and other workers to wash their hands thoroughly (soap or sanitiser) before boarding or leaving vehicles, and during any vehicle stops.

## Cleaning vehicles

Clean all areas in the vehicle that are commonly touched, using sanitiser and/or a low hazard cleaning product). In particular, clean vehicle:

- key fobs
- door handles/frames
- the steering wheel
- gearstick/handbrake
- radio/'satnav' and
- any other touch/steering column controls (indicators, lights, windscreen wipers etc)
- fuel/EV input.

On leaving the vehicle for use by anyone else, also ensure the vehicle is emptied of personal items such as mobile phones, bags/cases, and any clothing, PPE or waste materials. Remove cleaning materials, other waste and single-use PPE and ensure there are suitable waste disposal arrangements.

Retain sufficient quantities of hand sanitiser/low hazard cleaning materials/wipes within vehicles to enable the above.

## Face coverings

Apprentices and others sharing a vehicle – or using public transport – should wear a suitable face covering (e.g. a non-surgical mask).

## 3. On-site activity and training

The following refers to essential site activity, notably in relation to supervising/training apprentices.

### **Avoid close proximity working if possible...**

Workplace apprentice training and other activities should first be planned and organised to avoid all unnecessary work closer than the social distancing requirements, to minimise the risk of spread of COVID-19, and no work should be carried out that requires skin to skin contact.

This includes planning and arranging for activity to be done safely by *one person* where possible. Where supervision is required, consider how much of this can be *done with social distancing*.

For any site-based apprentice activity:

- consult beforehand with apprentices, supervisors and others as necessary, about planned mitigating measures
- comprehensive hygiene and cleaning measures must apply at all times
- increase fresh air ventilation in any indoor/enclosed spaces. Note: there is less risk of viral transfer outdoors.

Remind apprentices and other workers at least daily about social distancing, hygiene and all other mitigating measures

## Where closer proximity working is necessary and unavoidable

Where it is not possible to follow social distancing guidelines for activity that involves apprentices, then:

1. “consider whether the activity needs to continue for the business to operate.” If so;
2. “take all mitigating actions possible” (such as the measures below) to reduce the risk of COVID-19 transmission on site.

Conduct a suitable and sufficient risk assessment and communicate the significant findings with the apprentice (and optionally with appropriate others - e.g. parents), supervisors and other workers. Consult with the apprentice and other workers on preventative measures and a safe system of work (method statement) to control the risk.

Where it is necessary to carry out close proximity supervision or tasks:

- minimise the *frequency* and *duration* that workers are at less than the social distancing guidelines (e.g. reduce the time spent in *close proximity*)
- continually aim to maximise apprentice and other worker separation, even if the activity requires separation that is less than social distancing guidelines
- minimise the number of those involved at close proximity
- supervise/work side by side: avoid face to face activity wherever possible.
- consider creating/using an authorisation process for the activity

Consider creating a pair or small team. Keep the team:

- as small as possible
- together (do not change those within the team)
- away from other workers or others onsite, where possible

Consider whether there is *any scope* for using temporary barriers (such as clear plastic) between the apprentice’s work and others.

Designated supervision (e.g. a ‘compliance champion’) may be useful for monitoring and managing compliance with close proximity mitigating measures.

## RPE and face coverings

For typical construction and maintenance activity, government guidance does not support the use of RPE (e.g. tight-fitting face masks) as a protective measure *against coronavirus*. However:

- the use of tight-fitting face masks is still required if risk assessment shows they are needed to protect against *other* significant respiratory health hazards (beyond coronavirus).
- following risk assessment, suitable RPE or a face covering (which may include a visor) may be selected (along with other PPE) to *further mitigate* the risk of coronavirus from close proximity work, as part of “all mitigating actions possible.”

Do not *rely solely on RPE or face coverings* to provide protection from coronavirus. Other preventative measures (shown above) must also be deployed, as far as reasonably practicable, to mitigate the risk from essential close proximity activity.

If RPE is selected, then the wearer should have successfully undergone 'face fit testing', in addition to on-site mask fit checking. Eye protection may also help to protect workers' eyes from any airborne droplets.

A face covering/full face shield (visor) may lower viral exhalation risk, notably from anyone who has COVID-19 but is not yet showing symptoms, but it will not provide significant inhalation protection. If a face covering/visor is selected, then there should be collective use where possible (e.g. both supervisor and apprentice wearing a face covering/visor).

Note: a visor may help with communication, notably during supervision, and negate the need for light eye protection (subject to risk assessment).

Face coverings or visors should be distributed by the employer, along with suitable instruction on use, maintenance, hygiene, replacement, and disposal. 'Homemade' or 'site improvised' face coverings or visors are not recommended for use on site.

Government guidance says: "Face coverings are not a replacement for the other ways of managing risk, including minimising the time spent in contact, using fixed teams and partnering for close-up work, and increasing hand and surface washing".

#### **Key sources of information and advice**

- [www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/vehicles](https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/vehicles)
- [www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work](https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work)
- CLC Site Operative Procedures v4: [www.constructionleadershipcouncil.co.uk/news/site-operatingprocedures-version-4-published/](https://www.constructionleadershipcouncil.co.uk/news/site-operatingprocedures-version-4-published/)
- [www.hse.gov.uk/youngpeople/law/index.htm](https://www.hse.gov.uk/youngpeople/law/index.htm)
- Face fit testing RPE: [www.hse.gov.uk/respiratory-protective-equipment/fit-testing-basics.htm](https://www.hse.gov.uk/respiratory-protective-equipment/fit-testing-basics.htm)

*Note: Government and other information and advice may differ in Scotland, Wales and Northern Ireland). This guidance does not supersede any applicable UK or national regulations or official guidance (noting that regulation or guidance may change). All users of this guidance are required to carry out a 'suitable and sufficient' risk assessment to inform their decisions and actions, and ensure that all legal, contractual, safety, welfare and health requirements are complied with.*

[If you have any comments regarding the guidance above, please contact paul.reeve@eca.co.uk](mailto:paul.reeve@eca.co.uk)

General guidance on working in close proximity can be found in BESA/ECA guidance note GN2 at: <https://www.eca.co.uk/downloads/business-support/health-and-safety/coronavirus/covid-19-and-engineering-services-guidance-gn-2>



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