

**Practice Note: Workplace Readiness**

Updated 13 October 2020

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## **1. BACKGROUND**

- 1.1. The Disaster Management Regulations allow for the operation of essential services. On 23 April 2020, the President further announced the gradual and phased approach to other business operations which will differ having regard to the applicable level of lockdown as declared by Government from time to time (Levels 1 to 5).
- 1.2. Every employer will, during each of the levels of lockdown and for the foreseeable future thereafter, have to adhere to detailed occupational health and safety protocols. This means that all employers must re-examine their activities, work environment, risk assessments and policies in the light of the COVID-19 pandemic and may need to change, adapt or enhance these in order to operate.

## **2. SCOPE AND APPLICATION**

- 2.1. This document applies minimum practice guidelines for all employers operating in South Africa including all types of businesses (self-employed persons / sole proprietors, independent contractors, companies, close corporations) other organisations (non-profit organisations, trade unions, employer organisations, trusts, associations), and government (national, provincial or district level departments, entities and SOCs), and the like.
- 2.2. This practice note provides minimum requirements to be applied by employers to enable them to resume operations safely and in a manner that minimises the risk of COVID-19 transmission to workers and members of the public. However, small businesses with 10 employees or less may take less stringent measures described in paragraph 5.2.2 and paragraph 6.
- 2.3. Each employer is unique in its activities, environment, workforce and demographics, accordingly while each employer should, where reasonably practicable, apply the minimum controls herein it should consider any additional controls appropriate for its organisation, workspaces and commuting arrangements.
- 2.4. This practice note provides guidance to employers on the application of the Occupational Health and Safety Act ("OHS Act") and the regulations published thereunder and Disaster Management Regulations and the Ministerial Directives published thereunder.
- 2.5. Where there is a conflict between this document and any legislation, regulation or directive published on the same matter, then the regulatory document must be followed.

## **3. OBLIGATIONS OF EMPLOYERS**

- 3.1. As and when sectors are permitted to resume activities per the Disaster Management Regulations, employers in the sector will be required to provide and maintain, as reasonably practicable, a working environment that is safe and without risk to the health of workers.
- 3.2. In the context of the COVID-19 pandemic, this means any employer which is permitted to commence operations must develop measures to ensure that the workplace meets the standards of health protocols, adequate space for workers and physical distancing measures for the public and service providers, as required. Employers should take steps to eliminate or mitigate the transmission of COVID-19 in respect of its workers and any other person directly affected by the employer's activities (e.g. customers, clients or contractors and their workers who enter their workplace or come into contact with their workers).

- 3.3. Any employer which is permitted to commence operations during lockdown must phase in the return of their workers to work to manage the return of workers from other provinces, metropolitan and district areas.

#### **4. EMPLOYER DECLARATION**

- 4.1. The head / CEO of the employer should complete a declaration confirming:
- 4.1.1. the employer has determined that it is permitted to operate in term provisions of the National Disaster Act regulations;
  - 4.1.2. the location(s) of operations;
  - 4.1.3. compliance with applicable regulations and directives;
  - 4.1.4. that the employer has performed a risk assessment which takes into account all risk factors applicable to the workplace
  - 4.1.5. that the employer has designed and implemented a risk response framework which includes appropriate risk control measures having regard to the risk assessment and the measures referred to in this document.
- 4.2. A sample return to work risk management plan can be found [here](#).
- 4.3. A sample declaration for a business permitted to operate at level 1 lockdown can be found [here](#).

#### **5. COVID-19 RISK AND RESPONSE FRAMEWORK**

##### **5.1. Appointment of compliance officer**

- 5.1.1. Any employer which is permitted to commence operations during lockdown must designate a COVID-19 compliance officer who will:
- a) oversee the implementation of the plan for the phased in return of workers to the workplace as contemplated in paragraph 5.2.1; and
  - b) oversee the adherence to the standards of hygiene and health protocols relating to COVID-19 at the workplace (including appointing workers to perform this function if the employer has more than one workplace);
  - c) address employee or workplace representative concerns and to keep them informed; and
  - d) consult with health and safety committee on the nature of the hazard in that workplace and the measures that need to be taken (if there is such a committee in the workplace).

##### **5.2. Initial COVID-19 Workplace Readiness Plan**

- 5.2.1. Before reopening operations, an employer which is permitted to commence operations during lockdown must develop a plan for the phased in return of their workers to the workplace, prior to reopening the workplace for business. This plan must correspond with

risk management plan and must be retained for inspection. An employer must also consult on the risk assessment and plan with any representative trade union and any health and safety committee, a health and safety representative or employee representative

5.2.2. For small businesses, the COVID-19 Workplace Readiness Plan can be simpler but should capture the following minimum information:

- a) the date that the workplace will be open and the hours opening,
- b) which employees are permitted to work and the vulnerable employees;
- c) workplace risk assessment and what the plans for the phased-in return of their workers; and other persons (e.g visitors, contractors ) who have access to the workplace;
- d) what health and safety protocols are in place to protect employees from COVID-19; and
- e) the details of the COVID-19 compliance officer;
- f) a procedure to resolve any issue that may arise from the exercise by an employee of the right to refuse to work if circumstances arise which, with reasonable justification , appear to that employee or to a health and safety representative to pose an imminent and serious risk of their exposure to COVID-19.

5.2.3. For medium and larger businesses, a more detailed written plan should be developed given the larger numbers of persons at the workplace and in addition to the information in paragraph 5.2.2 should include the following additional information:

- a) the date the business will open and the hours of opening;
- b) the timetable setting out the phased return-to-work of workers, to enable appropriate measures to be taken to avoid and reduce the spread of the virus in the workplace;
- c) the steps taken to get the workplace COVID-19 ready including:
  - i. ways in which the number of workers at the workplace at any one time will be minimized;
  - ii. the workplace protective measures required to be taken in terms of the applicable OHSA Directions and any sectoral guideline; and
  - iii. measure for daily screening of workers and the screening of clients, contractors and visitors to the workplace.
- d) a list of workers:
  - i. permitted to return to work;
  - ii. who are required to work from home;
  - iii. who are Vulnerable Workers
- e) Arrangements for staff in the establishment including:
  - i. sanitary and physical distancing measures and facilities at the entrance and exit to the workplace;
  - ii. screening facilities and systems;
  - iii. the attendance-record system and infrastructure;
  - iv. the work-area of employees;

- v. any designated area where the public is served;
  - vi. canteen and bathroom facilities; and
  - vii. staff rotational arrangements (for establishments where fewer than 100% of employees will be permitted to work).
- f) Arrangements for customers or members of the public, including sanitation and social distancing measures.
- g) Communication, training and awareness process to notify employees of the measures implemented to mitigate the transmission. Informing workers of the dangers of the virus, manner of its transmission symptoms relating to COVID-19 and the reporting process for a COVID-19 diagnosed worker.

### 5.3. On-going compliance

- 5.3.1. In addition to performing a workplace readiness plan before commencing business during lockdown, all employers should regularly perform a risk assessment which should be enhanced to assess the risk of transmission of COVID-19 at the workplace. The risk assessment should, at a minimum:
- a) identify health or safety hazards associated with any work which is performed at that employer (including the risk of transmission of COVID-19);
  - b) analyse and evaluate each hazard and the associated health, safety and environmental risks;
  - c) design and implement a control framework so that precautionary measures are taken with respect to such risks;
  - d) monitor and review the effectiveness of the control framework and control measures; and
  - e) design and establish strong internal and external training , reporting and escalation mechanisms, as appropriate.
- 5.3.2. The employer must consult on the risk assessment and plan with any:
- a) representative trade union if applicable; and
  - b) health and safety committee or in the absence of such a committee, a health and safety representative designated in terms of OHS Act or employee representative.
- 5.3.3. Employers with more than 50 employees must submit a record of its risk assessment together with a written policy concerning the protection of the health and safety of its employees from COVID-19 to-
- a) its health and safety committee; and
  - b) the Department of Employment and Labour

5.4. The frequency of the risk assessment should be done at intervals appropriate for the employer but it is recommended that it be reviewed at each stage of lockdown and as new risks emerge and/or as new knowledge on the science develops on the COVID-19 virus is published.

5.5. The table below can be considered when compiling a risk assessment or reviewing it to include COVID-19 risk controls. A sample Risk Assessment Report can be found [here](#).

Planning	Identify Hazards	Analyse Risks	Evaluate Risks	Control Risks	Monitor and Review
<ul style="list-style-type: none"> <li>Establish team to do risk assessment.</li> <li>List all the activities or tasks in the workplace.</li> <li>Resources needed while conducting risk assessment.</li> <li>Develop training awareness and communication to be done to ensure workers are informed.</li> </ul>	<ul style="list-style-type: none"> <li>Categorise activities to determine exposure. (e.g. direct contact, indirect contact).</li> <li>Identify hazards from all activities and classify (e.g. biological hazards, environmental hazards).</li> <li>Identify exposure               <ul style="list-style-type: none"> <li>From community, visitors or contractors</li> <li>Occupationally acquired</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Examine identified hazards to determine risk and the impact.</li> <li>Classify risks               <ul style="list-style-type: none"> <li>High risk</li> <li>Medium risk</li> <li>Low risk</li> </ul> </li> <li>Assess risk impact               <ul style="list-style-type: none"> <li>Health (COVID 19)</li> <li>Safety</li> <li>Environmental</li> </ul> </li> <li>Consider risk of vulnerable workers. (age, medical conditions, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Determine whether the activity is normal, abnormal or an emergency activity.</li> <li>Establish the methodology to evaluate risk.</li> <li>Different criteria can be used such as below.               <ul style="list-style-type: none"> <li>Severity</li> <li>Probability</li> <li>Exposure</li> </ul> </li> </ul>	<p>Hierarchy of controls.</p> <ul style="list-style-type: none"> <li>Eliminate: change in process to have zero risk.</li> <li>Substitute: modify process to reduce the risk.</li> <li>Engineering controls: limit the hazard at its source.</li> <li>Administrative controls: work instructions or working procedures.</li> <li>Personal protective equipment (PPE): reduces risk by protecting individual and to be considered as last resort.</li> </ul>	<ul style="list-style-type: none"> <li>Monitor and evaluate if the implemented control measures are effective. If not take corrective measures.</li> <li>Review the risk assessment.</li> </ul>

## 6. MINIMUM RISK CONTROL MEASURES APPLICABLE TO SMALL BUSINESSES

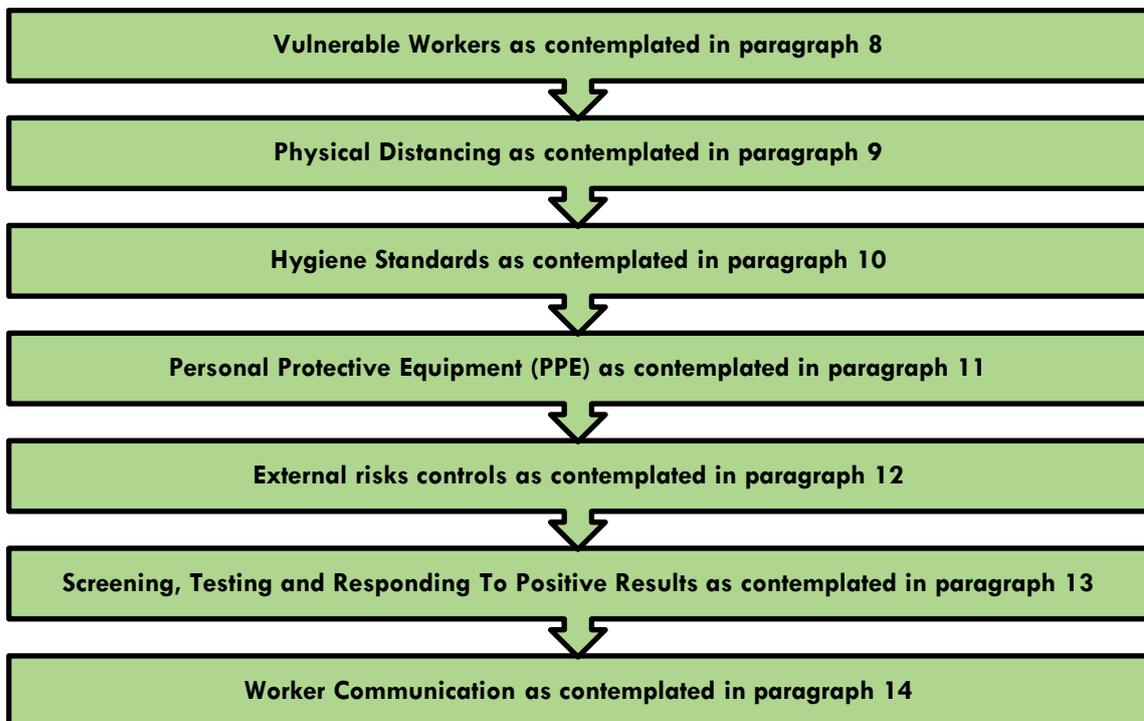
6.1.1. Employers with 10 employees or less should take the following minimum measures:

- develop a basic plan for the phasing in the return of its workers taking into account those that are able to work remotely and those over the age of 60 years or who have comorbidities;

- b) arrange the workplace to ensure that workers are at least one and half metres apart or, if not practicable, place physical barriers between them to prevent the possible transmission of COVID-19;
- c) ensure that workers are not permitted to work if they present:
  - i. any observable symptoms common with COVID-19 (cough, sore throat, shortness of breath or loss of smell or taste); and/or
  - ii. any other symptoms such as fever, body aches, redness of eyes, nausea, vomiting, diarrhea, fatigue, weakness or tiredness.
- d) immediately contact the **relevant provincial inspectorate** for instruction and direct the worker to act in accordance with those instructions;
- e) provide cloth masks or require workers to wear some form of cloth covering over their mouth and nose while at work;
- f) provide each worker with hand sanitizers, soap and clean water to wash their hands and disinfectants to sanitize their workstations;
- g) ensure that each worker washes with soap and sanitizes their hands while at work and ensures that their workstations are disinfected regularly; and
- h) take any other measures indicated by a risk assessment of the workplace including the such measures mentioned in paragraph 12.1 if the public have access to the workplace.

**7. MINIMUM RISK CONTROL MEASURES**

Every employer should implement the reasonable minimum controls having regard to the nature of their activities as it pertains to:



## 8. VULNERABLE WORKERS

### 8.1. Identification and assessment of vulnerable workers

- 8.1.1. COVID-19 is a new disease and there is limited information regarding individual risk factors for an infected person with complications and needing higher levels of medical intervention. Based on information and clinical expertise updated on 25 May 2020, older adults and people of any age who have impaired function of certain organs (heart, lung, kidneys) or depressed immune system are at higher risk for serious complications and severe illness from COVID-19. Based on information available at the time of this Practice Note, those at higher-risk for developing severe illness from COVID-19 include people:
- i) 60 years and older;
  - j) who live in a nursing home or long-term care facility; and/or
  - k) of any age with underlying commonly encountered chronic medical conditions, particularly if not well controlled, including people with one of or a combination of the following:
    - i. chronic lung disease: moderate to severe asthma, chronic obstructive pulmonary disease (COPD), bronchiectasis, idiopathic pulmonary fibrosis, active TB and post-tuberculous lung disease (PTLD)
    - ii. diabetes (poorly controlled) or with late complications;
    - iii. serious heart conditions: heart failure, coronary artery disease, cardiomyopathies, pulmonary hypertension, congenital heart disease;
    - iv. chronic kidney disease undergoing dialysis;
    - v. chronic liver disease including cirrhosis; and
    - vi. moderate/severe hypertension (poorly controlled) or with target organ damage
  - l) severe obesity (body mass index [BMI] of 40 or higher)
  - m) those who are immunocompromised. In this regard many conditions can cause a person to be immunocompromised, including cancer treatment, smoking, bone marrow or organ transplantation, immune deficiencies, poorly controlled HIV or AIDS, and prolonged use of corticosteroids and other immune weakening medications
  - n) >28 weeks pregnant (and especially with any of co-morbidities listed above)
- 8.1.2. Employers should implement a process to identify both workers who:
- a) are, themselves, at high-risk for severe illness from COVID-19; and
  - b) reside with or care for persons that are at high-risk for severe illness from COVID-19 (including family members, aged parents etc.).  
(hereinafter collectively referred to as “Vulnerable Workers”)
- 8.1.3. Employers should take on the expense of having a Vulnerable Worker assessed in the event that a worker cannot afford such costs, the employee should be assessed by a doctor (noting the doctor-employee confidentiality) and preferably one who has insight into the workplace and its processes.

- 8.1.4. For additional information on Vulnerable Worker assessment, leave procedures and incapacity management, please click [here](#).

## **8.2. Additional measures to protect Vulnerable Workers**

- 8.2.1. Employers should consider what additional risk control measures would be appropriate in respect of Vulnerable Workers and develop policies and procedures to give effect to those measures.
- 8.2.2. In this regard employers should supplement and enhance the risk control measures mentioned in paragraph 9 to 12 with additional measures to protect Vulnerable Workers. These measures would need to take into account the tailored to the circumstances of the Vulnerable Worker and their work environment and activities.
- 8.2.3. Employers are strongly encouraged to allow Vulnerable Workers that can work from home to do so.
- 8.2.4. In respect of Vulnerable Workers whose current roles and responsibilities do not allow for remote working should consult with Vulnerable Workers to determine if additional risk control measures could be implemented to mitigate the transmission risk to Vulnerable Workers including:
- a) whether the Vulnerable Worker can fulfil a different role and responsibility which has a lower risk for COVID-19 transmission;
  - b) whether the Vulnerable Worker's environment can be adapted or improved to lower the risk for COVID-19 transmission (i.e. by stricter physical distancing protocols or additional hygiene measures);
  - c) whether the Vulnerable Worker can be provided with additional hygiene enablement tools (such as providing the worker with their own hand sanitiser);
  - d) whether the Vulnerable Worker can be provided with specific PPE appropriate to the risk identified in the risk assessment;
  - e) whether external risks can be mitigated further (for example reducing interaction with visitors or the use of public transport); and
  - f) allowing the Vulnerable Worker to utilise his/her annual leave or sick leave during different levels of the lockdown.

## **9. PHYSICAL DISTANCING**

### **9.1. Reduce worker concentration**

- 9.1.1. Reducing face-to-face contact is an important measure to mitigate the impact of COVID-19. Employers should, as far as practicable, minimise the number of workers at the workplace at any given time through rotation, staggered working hours, shift systems, remote working arrangements or similar measures in order to achieve social distancing.
- 9.1.2. Workers that can work from home should work from home particularly where they are Vulnerable Workers. Employers should develop a directive or guidance on working from

home to provide clear advice to all workers working from home. (frequently asked questions about remote working can be found [here](#)).

- 9.1.3. Every employer should arrange the workplace to ensure minimal contact between workers and as far as practicable ensure that there is a minimum of one and a half metres between workers. A bigger distance may be required depending on the outcome of the risk assessment. Measures must also be taken to minimise contact between workers and members of the public.
- 9.1.4. If it is not practicable to arrange a worker's workstation(s) to be spaced at least one and a half metres apart, the employer should:
- a) arrange physical barriers to be placed between workers' working places or erected on workers' desks to form a solid, physical barrier between workers while they are working; or
  - b) if necessary, supply the worker free of charge with appropriate PPE based on a risk assessment of the working place.

## **9.2. Common areas**

- 9.2.1. Every employer should ensure that social distancing measures are implemented through supervision both in the workplace and in the common areas outside the immediate workplace through queue control or within the workplace such as canteens, coffee shops and lavatories.
- 9.2.2. At a canteen and workplace coffee shops these measures may include:
- a) dividing the workforce into groups or staggering break-times to avoid the concentration of workers in common areas such as the canteen.
  - b) prohibiting sit down food and only take away.
  - c) encouraging workers to bring their own lunches.
  - d) arranging for food to be delivered to workers' offices/desks to avoid having to go to the canteen.
  - e) closing of common areas to reduce pedestrian traffic.
  - f) staggering start / finish / break times to reduce traffic in common areas.
  - g) changing area layouts to create more space for movement.
  - h) minimising handling of cash and encourage contactless payments only.
  - i) markings on the floor / ground to define queueing quadrants to indicate minimum social distancing requirements.
  - j) providing for outside, well-spaced eating areas.
- 9.2.3. In other common areas these measures may include:
- a) prohibiting "hot desking" (i.e. workers should have dedicated desks).
  - b) markings on the floor / ground to define routes and indicate minimum social distancing requirements.

- c) leaving doors open (where appropriate) at busy times to speed up the flow of pedestrian traffic (and to avoid workers touching door handles).
- d) disabling vending machines.
- e) disabling of biometric systems where possible (introduce card systems).
- f) ongoing sanitation of door handles, lift buttons and furniture;
- g) social distancing to be applied in elevators.
- h) designating coffee cups and other crockery as far as possible.

9.2.4. Where required, provide dedicated lockers for the storage of their personal belongings, cell-phones and clothing such that there is no mixing and sharing of such facilities

### 9.3. Workplace meetings and gatherings

9.3.1. Where workplace meetings can be held via an online collaboration platform, it is strongly encouraged.

9.3.2. Where workplace meetings cannot be conducted virtually, strict protocols should be implemented in respect to in-person meetings:

- a) the maximum occupancy of the workplace meeting room should be determined having regard to social distancing principles above and excess seats should be removed from the room;
- b) the layout of workplace meeting rooms should conform with social distancing principles in so far as possible;
- c) the number of attendees that may attend a workplace meeting should be limited to the prescribed gathering requirements;
- d) the number of workplace meetings and the duration of workplace meetings should be reduced;
- e) attendees should avoid social niceties such as shaking of hands and hugging;
- f) all attendees should wear a face mask with nose and mouth covered;
- g) all attendees should wash hands / hand sanitizer before entering and exiting the workplace meeting room;
- h) doors to be left open during and between workplace meetings to avoid touching handles;
- i) desks / equipment / seat handles in meeting room should be sanitised immediately before and after meetings;
- j) meeting refreshments are permitted where the coffee cups are disposable, beverages are sealed and food is wrapped.

## 10. HYGIENE REQUIREMENTS

### 10.1. Hygiene enablement

- 10.1.1. The employer should ensure that:
- a) there are adequate facilities for the washing of hands with soap and clean water;
  - b) only paper towels are provided to dry hands after washing (fabric towelling must not be used);
  - c) surfaces that workers and members of the public come into contact, including reception desks, are routinely cleaned and disinfected and industrially sanitised, where appropriate. Work surfaces should be disinfected regularly (before, during and after each work day);
  - d) common areas and ablution facilities are sanitised more regularly;
  - e) workers are provided with the necessary tools and equipment required to perform their job to avoid sharing of workers' tools and equipment, insofar as it is reasonable and practicable to do so. Tools and equipment should be disinfected regularly (before, during and after each work day);
  - f) there are sufficient quantities of hand sanitizer (with at least 70% alcohol content) having regard to the number of workers or other persons who access the workplace at the entrance of, and in, the workplace which the workers or other persons are required to use;
  - g) every worker who works away from the workplace, other than at home, should be provided with an adequate supply of hand sanitizer;
  - h) if a worker interacts with the public, the employer should provide the worker with sufficient supplies of hand-sanitizer at that worker's workstation for both the worker and the person with whom the worker is interacting. These workers should be instructed to sanitize their hands between each interaction with a member of public; and
  - i) the workplace is sufficiently ventilated whether by natural or mechanical means. If reasonably practicable, the employer should have an effective local extraction ventilation system with high-efficiency particulate air HEPA filters, which is regularly cleaned and maintained. Where mechanical ventilation is used, the employer should ensure filters are cleaned and replaced in accordance with the manufacturer's instructions by a competent person.

## **11. PERSONAL PROTECTIVE EQUIPMENT (PPE)**

### **11.1. Types of PPE**

- 11.1.1. The type of PPE to be used will vary according to the setting and work activity, risk identified, medical risk factors in relation to Vulnerable Workers and should follow from the employer's risk assessment. For example, the PPE required for those caring for COVID-19 patients will differ to workers in an office or industrial environment. Employers should regularly check the websites of the National Department of Health, National Institute of Communicable Diseases and the National Institute for Occupational

Health whether any specialised personal protective equipment for COVID-19 is required or recommended in respect of the nature of the workplace or the worker's duties and the associated level of risk. Further guidance on the types of PPE as well as the application of appropriate PPE use be found here

- 11.1.2. The general requirement for workers to wear masks does not take away from the fact that, where a risk assessment indicates that PPE is required, those categories of workers should be provided with the accredited PPE in accordance with National Department of Health guidelines.
- 11.1.3. There may be specific regulations or standards which prescribe the minimum PPE requirements applicable for that industry.

## **11.2. Cloth masks for workers**

- 11.2.1. To ensure that N95 masks, surgical masks and other medical masks are secured for those workers who have the highest health risk such as health care workers, persons with respiratory symptoms or those caring for COVID-19 patients at home, employers should ensure all other workers do not use medical grade masks without good cause.
- 11.2.2. Employers should provide cloth masks to every worker in their workplace and require them to wear these masks while at the workplace and when in public places. This is in the interests of health and safety of workers in the workplace and as a support to the public health measures. These masks should be provided free of charge and an employer may not require a worker to pay the employer or any other person for a cloth mask or make a deduction from the worker's remuneration.

## **11.3. Every employer should provide each worker with a minimum of two cloth masks which meet the criteria recommended by the National Department of Health. The number of cloth masks that should be provided to a worker may increase having regard to sectoral guidelines or the worker's conditions of work, in particular, where these may result in the mask becoming wet or soiled and in accordance with any sectoral guidelines. **Training on the use and care of PPE and cloth masks****

- 11.3.1. Every employer should ensure that workers are informed, instructed, trained and instructed as to the correct use of both PPE as well as cloth masks.
- 11.3.2. In respect of cloth masks, training should explain:
  - a) hands should be washed before and after donning or removing the cloth mask;
  - b) that cloth masks should cover the nose and mouth completely;
  - c) cloth masks should not be lowered when speaking, coughing or sneezing;
  - d) cloth masks should never be touched except to put on and remove (fidgeting with the mask repeatedly is strongly discouraged);
  - e) cloth masks should be washed with warm soapy water and iron when dry. Ironing assists with decontamination;
  - f) cloth masks should be changed when wet or visibly soiled; and

- g) The cloth mask should not be promoted as the primary prevention strategy and should never be promoted separately from hand-washing and social distancing.

#### **11.4. Health worker PPE**

- 11.4.1. Health workers in a health setting should use PPE based on a documented risk assessment and should meet the minimum recommendations without using excess PPE for the setting / task. PPE for a health worker may include:
  - a) disposable gloves;
  - b) disposable plastic apron;
  - c) closed shoes, non-slip soles and shoe covers;
  - d) eye protection (goggles/face shield or visors); and
  - e) respiratory protection (FFP2/N95 or more sophisticated respirators) for high risk situations (e.g. aerosol-generating procedures), and surgical masks for infectious persons.
- 11.4.2. Employers should ensure that PPE is adequate and must be available in the appropriate sizes.
- 11.4.3. Health workers should be trained on the donning and doffing of PPE appropriate to the tasks being performed.
- 11.4.4. Employers should ensure that PPE is consistently and properly worn when required. Further information on the use of PPE when caring for patients with confirmed or suspected COVID-19 can be found here. According to the National Institute of Health this applies to all medical staff, including those that are occupationally based, in the context of caring for people who have confirmed or suspected COVID-19.

### **12. EXTERNAL RISK CONTROLS**

#### **12.1. Visitors / members of the public**

- 12.1.1. Employers are strongly advised to place an ongoing restriction on visitors to a workplace. However, in the event where an employer-critical visitor, supplier, customer, or delivery service may need to attend a site, a controlled access process should be in place including requiring the visitor to wear a cloth mask, , be subjected to symptom screening, adherence to health and safety protocols of the employer, implementation of sanitisation processes and obtaining full personal contact details (e.g. telephone number, last place visited to assist with contact tracing should this be necessary).
- 12.1.2. Some businesses cannot avoid interactions with members of the public and must consider additional measures to protect its workers from being exposed to COVID-19 as a result such public interactions. Depending on what is reasonably practicable given the nature of the workplace, the employer should:

- a) determine the floor area of the workplace in square metres in order to determine the total number of persons (including both workers and members of the public) that may be inside the workplace at any one time in order to maintain adequate space available;
- b) arrange the workplace to ensure that there is a distance at least one and a half metres between workers and members of the public or between members of the public;
- c) put in place physical barriers at counters or provide workers with face shields or visors;
- d) if appropriate, undertake symptom screening measures of members of the public entering the workplace with due regard to available technology and any guidelines issued by the Department of Health;
- e) if appropriate, display notices advising members of the public entering the workplace of the precautions they are required to observe while in the workplace;
- f) require members of the public, including customers and suppliers, to wear masks when inside their premises;
- g) take steps to ensure that members of the public (such as customers) queuing inside or outside the workplace are able to maintain a distance of one and half metres from each other;
- h) provide hand sanitizer for use by the public at the entrance to the workplace;
- i) designate a compliance officer to ensure that these measures are complied with and that all directions in respect of hygienic conditions and limitation of exposure to persons with COVID-19 are adhered to. The name of the compliance officer must be prominently displayed in an area viable to the public.

12.1.3. Where practicable, employers should avoid workers from attending client or supplier premises. However, in the event where such attendances are critical to the employer operations, a controlled risk mitigation process should be in place.

## **12.2. Public transport**

12.2.1. Employers are encouraged to minimise the number of workers at the workplace at any given time through rotation, staggered working hours, shift systems, remote working arrangements or similar measures in order to achieve social distancing and to limit congestion in public transport and at the workplace.

12.2.2. Where employers provide transport for workers, employers should ensure that safe transport arrangements are made, including:

- a) sanitisers for workers
- b) surgical masks for taxi drivers
- c) social distancing and capacity arrangements.

- 12.2.3. Employers should train workers who rely on public transport or who utilise employer arranged on transport on the health and safety protocols to be followed. An example of minibus taxi guidelines can be found here.

## **13. SCREENING, TESTING AND RESPONDING TO POSITIVE RESULTS**

### **13.1. Definitions**

- 13.1.1. Symptom screening An active programme of action undertaken by the workplace to detect the presence of COVID-19 related symptoms in workers who may otherwise be healthy when they present to work or reported by the worker prior to presenting at work.
- 13.1.2. Testing The collection of biological samples by trained health professionals from the passages of the nose and throat to detect for the presence of coronavirus 2 (SARS-CoV-2) using standardised and currently validated and well accepted laboratory tests called polymerase chain reaction (PCR) tests.
- 13.1.3. Isolation According to the WHO's International Health Regulations, (2005) it is defined as the separation of ill or contaminated persons from others in such a manner as to prevent the spread of infection or contamination. In the context of the COVID-19 pandemic, isolation may include, amongst others:
- a) isolation at a person's home – self-isolation;
  - b) isolation in a health facility; or
  - c) isolation at a designated facility.
- 13.1.4. Quarantine According to the WHO's International Health Regulations, (2005) it is defined as the restriction of activities and/or separation from others of suspect persons who are not ill in such a manner as to prevent the possible spread of infection or contamination. The purpose of quarantine is to prevent the transmission of diseases. Quarantine will be applied to:
- a) An individual or to a group of persons who were exposed to the coronavirus;
  - b) Persons believed to have been exposed on a conveyance during international travel; or
  - c) A wider population- or geographic-level basis.

### **13.2. Testing and screening**

- 13.2.1. Employers should have measures in place to ascertain whether any worker, when arriving at work, has:
- a) any observable symptoms common with COVID-19 (cough, sore throat, shortness of breath or loss of smell or taste); and/or
  - b) any other symptoms such as fever, body aches, redness of eyes, nausea, vomiting, diarrhea, fatigue, weakness or tiredness.
- 13.2.2. Furthermore, employers should require every worker to immediately report to their employer whether they suffer from any of the abovementioned symptoms. In this regard, employers should communicate a clear process applicable to workers.
- 13.2.3. Employers should require workers to immediately inform the employer if they experience symptoms associated with COVID-19.
- 13.2.4. Employers should know where to refer workers for testing if presenting with the above symptoms. and keep a listing of the testing centres closest to their workplace. The current procedure is to notify the National Department of Health through their helpline (0800 029 999) to obtain further directions.
- 13.2.5. Employers must comply with any guidelines issued by the National Department of Health in respect of symptom screening and medical surveillance and testing where required.

### **13.3. Responding to a worker with symptoms or positive results**

- 13.3.1. If a worker presents or reports typical COVID-19 related symptoms:
- a) do not permit the worker to enter the workplace or report for work;
  - b) if the worker is already at work, immediately isolate the worker, provide a surgical mask to the worker, and arrange for the worker to be transported in a manner that does not place other workers or members of the public at risk, for a medical examination, for testing or to be self-isolated;
  - c) if the employee does not need hospital admission and is sent home, ensure that the employee undergoes self-isolation at home if appropriate, or at a designated isolation accommodation identified by the employer, in line with National Department of Health guidelines;
  - d) provide prompt counselling and support to the employee as per institution's guidelines/standard operating procedures (SOPs);
  - e) immediately assess the risk of transmission and if appropriate, disinfect the area and workstation;
  - f) undertake contact tracing and refer other workers who may also be at risk for symptom screening;

- g) place the worker on paid sick leave, or if sick leave is exhausted, make application for illness benefits from the UIF in terms of the Directive issued on 25 March 2020;
- h) ensure that the worker is not discriminated against on grounds of having tested positive for COVID-19; and
- i) consider if any other reasonable measures need to be taken (such as temporary closure and decontamination).

13.3.2. If a worker is diagnosed with COVID-19 an employer must:

- a) report the diagnosis to the National Institute for Occupational Health in accordance with the Department of Health Guidelines either directly or through an employers' association.
- b) provide administrative support to any contact tracing measures implemented by the Department of Health;
- c) immediately investigate the manner of exposure including any control failure and review its risk assessment to ensure controls and PPE requirements are in place ;
- d) assess the risk of exposure of other workers who were in contact with the positively-diagnosed worker in accordance with the Department of Health's Guidelines. If the risk of transmission between workers is:
  - i. high then the other worker(s) must remain in quarantine for 10days and the employer must place those worker(s) on sick leave;
  - ii. low then the employer may permit the other worker(s) to continue working using a cloth moth and must monitor the workers symptoms for 10days from date of possible exposure.
- e) determine whether the affected work area needs to be temporarily closed and decontaminated based on an incident-based risk assessment and with due regard to the Department of Health's Guidelines; and
- f) refer other workers who may also be at risk for symptom screening.

13.3.3. If there is evidence that the worker contracted COVID-19 in the course of his/her employment, the employer should lodge a claim for compensation with the Compensation Commissioner in the prescribed format using the relevant documentation as required in terms of the Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA) in order to facilitate procedures for all worker's compensation benefits available to employees, including:

- a) leave for temporary disability;
- b) assessment by an occupational medicine specialist in cases of complex disease that may result in permanent disability;
- c) cover of medical expenses for the treatment and testing, as well as permanent

disability assessments; and

d) compensation to dependents in case of death.

#### **13.4. Returning to work after testing positive for COVID-19**

13.4.1. If a worker has been diagnosed with COVID-19 and isolated in accordance with the Department of Health Guidelines, the employer may only allow a worker to return to work ::

- a) Without requiring viral testing if the worker has completed the mandatory 10 days of isolation either from the onset of symptoms
  - i. in mild cases of infection (not requiring hospitalisation for COVID-19); or
  - ii. in moderate to severe cases of infection (requiring supplemental oxygen or hospitalisation) from the date of achieving clinical stability or earlier if the worker has gone a medical evaluation confirming fitness to work.
- b) the worker wears the minimum of a surgical mask at all times for the remaining period of 21 days from the date of initial diagnosis;
- c) the employer ensures that the worker adheres to social distancing, personal hygiene, wearing of masks and cough etiquette; and
- d) the employer closely monitors the worker for symptoms on return to work.

#### **14. WORKER EDUCATION, ENGAGEMENT AND COMMUNICATION**

##### **14.1. Training and awareness**

14.1.1. Every employer should implement a suitable training and awareness campaign in respect of:

- a) the dangers of COVID-19 disease;
- b) the manner of its transmission;
- c) the measures to prevent transmission such as social distancing, personal hygiene practices, PPE requirements and utilisation (including cloth masks), social etiquette (including cough etiquette, greetings, respiratory hygiene);
- d) safe transport to and from work;
- e) symptom monitoring, screening and confirmatory testing;
- f) the protocol to be followed by employees who are sick or have symptoms associated with COVID-19; and
- g) the content of relevant health and safety directions issued in terms of the Disaster Management Regulations.

h) Hazards, risks and precautionary measures implemented in the workplace to ensure the health and safety of workers.

14.1.2. Employers are encouraged to put up appropriate signage on their premises and communicate and educate workers on the National Department of Health recommendations to prevent COVID-19 related disease. (An example for employers to consider can be found [here](#)).

14.1.3. Worker hygiene practices are important to prevent and contain the spread of the coronavirus, employers should provide workers with information that raises awareness in any form or manner, including where reasonably practicable leaflets and notices (an example of handwashing awareness materials can be found [here](#)).

## **14.2. Prevent stigma and discrimination**

14.2.1. Social stigma may be created in labelling, stereotyping, discriminating, and/ or experiencing loss of status because of a perceived link with the COVID-19 disease. Stigma can undermine social cohesion, workplace stability and prompt social isolation of groups, which might contribute to a situation where the virus is more, not less, likely to spread. This can result in more severe health problems and difficulties controlling a disease outbreak. Stigma can:

- a) drive workers to hide the illness to avoid stigma and/or discrimination;
- b) prevent workers from seeking health care immediately; and/or
- c) discourage workers from adopting healthy behaviours.

14.2.2. Employers should make every effort to ensure that its training and awareness campaigns, policies and responses to COVID-19 do not foster social stigma in respect of workers with symptoms of COVID-19. The manner that employers communicate about COVID-19 and its policies and response to manage COVID-19 virus transmission is critical to combat the disease and to avoid fuelling fear and stigma.

14.2.3. Employers should use their best efforts to create an environment in which COVID-19 can be discussed and addressed openly, honestly, and effectively. When communicating about COVID-19 and the employer's responses thereto they should carefully consider the use of words and language which may have a negative meaning for workers and may fuel stigmatizing/discriminatory attitudes.

## **14.3. Create safe worker engagement platforms**

14.3.1. Workers are often best placed to give input on practical risks mitigation interventions for particular work areas.

14.3.2. Employers are encouraged to engage with workers, through their normal workplace engagement mechanism, or additional engagement platforms specifically designed for COVID-19 purposes, in order to implement customised and practical arrangements to ensure the minimisation of workplace risks.

14.3.3. Safe engagement platforms should be considered for worker engagement.

- 14.3.4. Employees may refuse to perform any work if circumstances arise which with reasonable justification pose imminent and serious risk of their exposure to COVID-19.

**14.4. Address worker concerns and psycho-social support**

- 14.4.1. Be aware of workers' concerns about pay, leave, safety, health, and other issues that may arise during the COVID-19 pandemic. Provide adequate, usable, and appropriate training, education, and informational material about employer-essential job functions and worker health and safety, including proper hygiene practices and the use of any workplace controls (including PPE). Informed workers who feel safe at work are less likely to be unnecessarily absent.
- 14.4.2. Where possible, employers should provide access to psycho-social support professionals and councillors for those working, and not working.