

Covid-19: Face Coverings in the Workplace

- **Will face coverings become normal at work?**
- **What are the standards?**
- **What do I need to consider?**

What do we mean by Face Coverings?

- “Face coverings” is a term being used by the World Health Organisation and the UK Government to mean any covering of the mouth and nose intended to reduce the chance of the wearer expelling droplets into the air.
- They are an aid to respiratory etiquette (like sneezing into a handkerchief or covering your face when you cough).
- Face coverings are not meant to include medical-grade masks used for infection control or respirators which are designed to protect the wearer from inhaling infected material.
- At present there is no official standard for face coverings, although there are recommendations from the World Health Organisation and others about their basic construction.

Face Coverings and Occupational Hygiene

BOHS has previously taken the position that measures to enhance respiratory etiquette, such as face coverings, may assist in reducing the risk of people unwittingly infecting others. They could therefore make an important contribution to controlling infection spread. However, three main points arise for discussion as follows:

- The uncertainty around the minimum requirements of a face covering
- Proper use of face coverings, including hygiene protocol
- Employer liabilities when face coverings are worn in the workplace, whether or not that is by mandate

The UK government has already made a general *recommendation* for the public to wear face coverings, intended to prevent infected individuals (symptomatic or asymptomatic) transmitting the disease in enclosed spaces where social distancing was likely to be problematic eg; in transport, retail and other public spaces (see <https://www.gov.uk/government/news/public-advised-to-cover-faces-in-enclosed-spaces>). This recommendation did not replace the need for social distancing, or other previously announced measures but was intended to provide an additional layer of safety.

Subsequently, UK government has announced that from 15 June, face coverings will be *required* while using public transport in England (see <https://www.gov.uk/government/news/face-coverings-to-become-mandatory-on-public-transport>). In addition, the requirement extends to all visitors to hospitals and hospital staff. The requirement does not currently include other enclosed spaces such as shops. Nevertheless, as lock down measures are gradually lifted it seems likely that the mandate for use of face coverings will be extended to other scenarios.

The trend toward wearing face coverings in busy or confined public spaces has gained traction. BOHS has previously noted that public spaces are invariably other people's workplace. Face coverings, and higher levels of protection, are being adopted in many non-public workplaces where social distancing during essential works is a difficulty. Given the levels of anxiety amongst the populace it seems reasonable to anticipate that there will also be many non-public workplaces where worried staff will insist on the use of face coverings even when social distancing can be achieved.

The following discussion is pending determination of face covering standards by UK government and therefore is general advice. Once a UK government standard is available BOHS will consider endorsement and application to various workplace scenarios. This discussion should be considered alongside guidance provided in the following Health & Safety Executive documents

- <https://www.hse.gov.uk/news/assets/docs/working-safely-guide.pdf>
- <https://www.hse.gov.uk/news/assets/docs/talking-with-your-workers.pdf>

Face Coverings

Face coverings have been described as a type of face mask for which there are no claims of an intended protective or medical purpose. They vary widely from products manufactured and sold commercially to "DIY" improvisations made at home.

Face coverings must not be taken as protection for the wearer against SARS-Cov2 (the virus causing Covid-19) because there is insufficient evidence they provide adequate fit and filtration efficiency. They should not be regarded as personal protective equipment.

Face coverings are primarily intended to reduce the risk of transmitting large droplets during coughing, sneezing and talking however, as stated above, there are three main areas of concern to BOHS;

1. **The uncertainty around the minimum requirements of a face covering**
2. **Proper use of face coverings, including hygiene protocol**
3. **Employer liabilities when face coverings are worn in the workplace, whether or not that is by mandate**

1. **Minimum Requirements of a Face Covering**

Face coverings are commercially available. A brief perusal of the internet will guide a prospective purchaser to a multitude of options. There are no UK recognized standards for face coverings at present, however we are aware of a European Community initiative to provide standards for face coverings including design, materials used and product architecture. For the moment, there is some guidance available in the document AFNOR Spec S76-001 Barrier Masks Guide to Minimum Requirements, methods of testing, making and use Serial manufacture and artisanal (or DIY) (see: <https://api.pks.rs/storage/assets/AFNOR-SPEC-S76-001-Barrier-masks-27032020.pdf>)

The UK government has provided advice on wearing and making face coverings (see <https://www.gov.uk/government/publications/how-to-wear-and-make-a-cloth-face-covering/how-to-wear-and-make-a-cloth-face-covering>) however BOHS is of the opinion that the advice that a face covering "can be as simple as a scarf or bandana that ties behind the head" is not appropriate for any scenario where public may be in close contact with employees (such as transport workers), or in work situations where social distancing during essential works is a difficulty. In our opinion, the advice should at least clearly state that tight weave materials (such as cottons) are required and a reasonable facial fit achieved.

Where individuals decide to make their own face coverings care should be taken to refer to a reputable on-line resource for details on design and manufacture, such as;

<https://www.bigcommunitysew.co.uk/>

<https://www.which.co.uk/reviews/face-masks/article/face-masks-where-to-buy-them-and-how-to-make-your-own>

The above resources, for example, describe the advantage of introducing simple design features such as nose clips.

2. Proper use of Face Coverings and Hygiene Protocols

Advice on the correct use of face coverings and hygiene protocols is readily available from the links provided in this note. In addition to the recent change in UK government advice the World Health Organisation (WHO) has also recently modified their position on face masks and coverings saying they should be worn in public where social distancing is not possible to help stop the spread of coronavirus. The WHO, and others, have provided helpful advice on the use of face coverings and suitable hygiene protocols (for example see <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public/when-and-how-to-use-masks> and <https://www.hse.ie/eng/services/news/newsfeatures/covid19-updates/partner-resources/hse-face-covering-guidelines-poster-screen.pdf>). The latter advice suggests throwing away a face covering after each use, we are not convinced this is necessary when a face covering could be put into a plastic storage bag, washed and re-used by the individual wearer in accordance with advice published by others.

3. Employer Liabilities

The BOHS would alert occupational hygiene professionals and employers to a series of issues concerning the use of face coverings in the workplace. There is no settled law on this matter, but the following may be of use when determining the responsibilities of employers.

Face coverings in situations where strict social distancing cannot always be guaranteed **may be** a low effectiveness means of protecting the general workforce from the risk of infection from asymptomatic individuals. There are no explicit legal requirements around employers' duties and the wearing face coverings where they are used for hygiene reasons and not for the purposes of personal protection. Any duties arise from the duties of a reasonable employer to promote hygiene in the workplace, specific duties in terms of equality, health and safety and to undertake risk assessments relevant to the current crisis based on scientific knowledge and guidance.

3.1 General

Whether a decision is made to restrict, permit or require staff to wear face coverings the following points should be borne in mind:

1. You must undertake an appropriate COVID-19 and general health and safety risk assessment.
2. If an individual is at particular risk of infection and/or other health and safety risks require it, then Respiratory Protection Equipment (designed, when properly fitted, to reduce risk to the wearer from harmful exposure through breathing) **must be** provided.
3. If your decision is to allow only some members of the workforce to wear masks, this must be on a reasoned basis and considerate to the wellbeing of the workforce and of those they come into

contact with. For example, preventing customer-facing staff from wearing face coverings because of difficulties in communication may not be reasonable, whereas visors may be.

4. You must avoid direct and indirect discrimination, such as permitting only women or only older workers to wear masks. This may amount to unlawful workplace discrimination.
5. You must keep alert to changes in recommendations by government and industry bodies and regularly review your risk assessments.
6. You should consult with your employees and Health and Safety representative (where there is one designated).
7. Your decision should be a reasonable one, reflecting not only the balance of risks, but also consideration of the mental health and wellbeing of your employees, their state of concern and the perceived likelihood of asymptomatic workers being present (which may include the frequency of change of the workforce, reliance on public transport to access the workplace and other factors).
8. Some workers may have to access the workspace using public transport where there may be a legal requirement to wear face coverings. The provision of suitable sanitary locations for the safe removal of face coverings and hand sanitization would be an appropriate hygiene precaution. Where applicable, such sanitary arrangements would also serve for storage of face coverings during breaks at work.

3.2 Restricting the wearing of face coverings

There is no specific legal entitlement for employers to prevent workers from wearing face-coverings in the workplace. Therefore, in addition to the general observations, a reasonable employer might have regard to the following:

1. Relevant considerations for deciding on other measures to reduce infections instead of face coverings include:
 - a. evidence of more effective controls;
 - b. potential real risks to safety, arising from hazards such as combustion or snagging;
 - c. genuine impedance of the ability to undertake work effectively;
 - d. potential risk to the health of the workforce, e.g. because of thermal exposure, limitations to the effectiveness of other precautions, such as hygiene precautions in food preparation (in such circumstances, measures other than face coverings should be considered, such as social distancing, engineering controls and administrative controls); and,
2. You must consider whether use of face coverings is an appropriate course of action to reduce the risk of infection of other workers and record the reasons why you do not think it is.

3.3 Permitting the wearing of face coverings

There may be employees who believe that wearing face coverings is the socially responsible thing to do or a collective view that this is of mutual benefit to all as a complement to other measures. Allowing members of the workforce to choose to wear face coverings is legally permissible, provided that this

does not result in the compromise of other duties. As an employer, your primary duty is to ensure the health, safety, and wellbeing of your staff. It is more important for you to take this into consideration. You may also wish to make yourself aware of issues related to bullying that can arise if there is divided opinion on the subject.

1. Relevant considerations for deciding on permitting the wearing of face coverings, but not *requiring* them include:
 - a. the absence of potential real risks to safety, arising from hazards such as combustion or snagging;
 - b. the absence of any genuine impedance of the ability to undertake work effectively;
 - c. the absence of potential risk to the health of the workforce, e.g. because of thermal exposure, limitations to the effectiveness of other precautions, such as hygiene precautions in food preparation (in such circumstances, measures other than face coverings should be considered, such as social distancing, engineering controls and administrative controls and will still be required as the standard of care should be the same as if no members of the workforce are wearing face coverings); and
2. You must consider whether taking an optional approach to the wearing of face coverings is an appropriate course of action to reduce the risk of infection of other workers and record the reasons why you think it is the best approach;

3.4 Requiring the wearing of face coverings

While there is no direct requirement for the wearing of face coverings and there is a limited proven benefit, it may be that as an employer it seems a reasonable precaution to further lessen the risk within the workplace. If, as a result of a reasonable risk assessment, an employer decides it is going to require the wearing of face coverings, this must be reasonable and necessary to promote the health of staff. In this case, it may be treated as any other employer-led health and safety requirement in line with the employer's normal policies.

1. Relevant considerations for requiring employees to wear face coverings, include:
 - a. the absence of potential real risks to safety, arising from hazards such as combustion or snagging;
 - b. the absence of any over-riding impedance of the ability to undertake work effectively;
 - c. the absence of over-riding risk to the health of the workforce, e.g. because of thermal exposure, limitations to the effectiveness of other precautions, such as hygiene precautions in food preparation (in such circumstances, given the limited effectiveness of face coverings, you should still have in place other measures such as social distancing, engineering controls and administrative controls); and
2. You must record the reasons why you think it should be a workplace requirement;
3. You are responsible for the provision, cleaning and maintenance of face coverings and to ensure that they are suitable for the purposes that they are required;
4. You are responsible for the provision of suitable sanitary locations for the safe removal of face coverings - and hand sanitization would be a required hygiene precaution, as would be the

provision of a storage location. Such storage arrangements should also be used for face coverings during breaks at work

Closing Remarks

Occupational hygienists and other health and safety professionals will likely have to address the use of face coverings, either through their adoption as a measure to reduce the risk of virus transmission from the public to employees, or transmission of virus between employees.

The procurement of face coverings and management of hygiene is relatively straightforward, however there are a range of issues to be carefully considered when face coverings move from the public to occupational environment.

A consensus on approach to these issues remains to emerge, but in the meantime we trust the above advice serves to inform on what is currently regarded as good practice and alert to potential pitfalls.