

No. 517/2020

28 October 2020

Our Ref: E1/20

**To: All Branches**

Dear Colleagues,

## **Cleaning Standards For Buildings & Vehicles (Coronavirus/Covid-19) – HSE Enforcement Action:**

As Branches and in particular Health and Safety Reps will be aware, there have been constant announcements and reminders issued by the Government, the UK's Chief Medical Officers, the Scientific Advisory Group for Emergencies (SAGE), NHS, DHSE, PHE, HSE and Local Authorities etc., all emphasising the need for the uplifting and maintenance of cleaning standards of the workplace, stressing the need for more regular and stringent cleaning standards to combat the Coronavirus/Covid-19 Virus spread.

This matter has in turn been raised repeatedly by the Health, Safety & Environment Department at the weekly RMG/CWU National Joint Coronavirus Operational Group Skype Meetings and with the Royal Mail National Directors (Ricky McAulay RM Field Operations Director, Shaun Davis RMG Global Director compliance and sustainability, Simon Barker RM National Network & Integration Director and Freddie Warnock RMG UK Operations National Safety Health & Environment Strategic Business Partner and separately with Martin Gafsen Director Royal Mail Group Property & Facilities Services – and their senior management teams).

Recently at Deeside Parcelforce Depot, there was an intervention by a HSE Field Force Enforcement Inspector which resulted in the findings of two crucially **significant Covid-19 contraventions** on the subject of the cleaning standards of the building and of the vehicles. As a result, an Enforcement Notice and Fee For Intervention (FFI) charge was served on the business, (a copy is attached).

Firstly - notably the HSE Inspector found that RMG/Parcelforce had made two contraventions of Sec.2(1) of the Health and Safety at Work Act 1974 which sets out the employer's legal duty and requires the employer to ensure the health, safety and welfare of all employees.

The HSE notice states that this duty extends to managing and controlling risks of infection from coronavirus in the workplace and includes measures such as frequent cleaning of surfaces such as door handles, taps etc., social distancing, and other mitigation measures. During the Inspector's investigation of the COVID-19 arrangements at the premises, he found that the **current cleaning arrangements are not sufficient to minimise the risks associated with COVID-19.**

The HSE Inspector stated that Royal Mail Group/Parcelforce **must increase how often and how thoroughly the business cleans the workplace,** as well as:

- Cleaning surfaces that are not normally cleaned.
- Develop and implement a cleaning policy for the facilities at the Depot/Office.
- Monitor the cleaning to ensure cleaners are following company cleaning policy and standards.
- Keep records.
- Inform all cleaners of the cleaning policy content and instruct them on the cleaning procedure.

Secondly – In relation to **vehicle cleaning**, the HSE Inspector found that drivers did not have the time to clean their vehicle at the end of each shift to the required standard to be 'Covid-Safe' and **there is currently no supervision or monitoring of this cleaning activity.** Additionally, it was found that **cleaning of vehicles was not always completed.** The HSE Inspector concluded that current **cleaning arrangements of vehicles are not sufficient to minimise the risks associated with COVID-19 and instructed Royal Mail Group/ Parcelforce that they must ensure that employees clean Vehicles after each use which is important to prevent any transmission of COVID-19 by touching contaminated surfaces.**

The Inspector found that at present, there is no supervision or monitoring of vehicle cleaning and that there is only limited time for staff to complete this important task of cleaning their vehicles. He concluded on this point that because of the lack of supervision and limited time allocated, this important task is not always completed and that this failure increased the risk of infection from Coronavirus/COVID-19, therefore suitable a cleaning system with supervision and monitoring must be implemented to ensure this task is completed to the required standard. Royal Mail Group/Parcelforce are required by the HSE to develop and implement a vehicle cleaning policy and all drivers must be informed of the policy content and instructed on the cleaning procedure, materials to use and on waste disposal. Appropriate cleaning materials must be made available to drivers and sufficient time provided to allow vehicle cleaning to be completed. RMG/Parcelforce must additionally ensure that arrangements are in place to monitor the cleaning of vehicles, and that records are kept, demonstrating which vehicle/driver was inspected and whether they were following the company vehicle cleaning policy.

In short, Royal Mail Group and Parcelforce as the employer must provide:

- Adequate time for staff to clean their vehicles at the end of each shift or use.
- Adequate cleaning materials.
- Adequate waste disposal arrangements.
- Arrangements for monitoring the vehicle cleaning.
- Carry out inspections and keep records demonstrating the vehicles have been cleaned and drivers were following the company vehicle cleaning policy.

**The HSE Inspector's findings required that remedial action needed to be applied across all Parcelforce Depots and in fact across all Royal Mail Offices and all of the Vehicle Fleet wherever they operate.**

**Would All Area Health and Safety Reps and Workplace Health and Safety Reps bring the attached HSE 'Notice of Contravention' to the attention of their local office and area operations management in order to press home the need for better cleaning standards – failing which there will be further HSE Enforcement Action which if repeated will undoubtedly lead to prosecutions and fines.**

**This information can equally be used to bring this matter to the attention of BT or any other employer to remind them of the Health and Safety at Work Act 1974**

**Section 2 General Duties to ensure the health, safety and welfare of their workforce plus the Workplace (Health, Safety and Welfare) Regulations 1992 Section 9 duty to ensure every workplace is kept sufficiently clean.**

**Attachments:**

- HSE 'Notice of Contravention'.

Yours sincerely



**Dave Joyce**  
**National Health, Safety & Environment Officer**