

TT CLUB
established expertise

Safeguarding the workforce

Guidance for UK ports during COVID-19

TT CLUB
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About Us

TT Club

TT Club is the established market-leading independent provider of mutual insurance and related risk management services to the international transport and logistics industry. TT Club's primary objective is to help make the industry safer and more secure. Founded in 1968, the Club has more than 1100 Members, spanning container owners and operators, ports and terminals, and logistics companies, working across maritime, road, rail, and air. TT Club is renowned for its high-quality service, in-depth industry knowledge and enduring Member loyalty. It retains more than 93% of its Members with a third of its entire membership having chosen to insure with the Club for 20 years or more.

www.ttclub.com

British Ports Association

The British Ports Association represents over 100 members, who own and operate over 400 ports and terminals, facilitating in one form or another 86% of port tonnages and 85% of all vessel calls. We also represent all the UK's passenger ports and all the main energy gateways, 19 of the top 20 fishing ports and an extensive network of ports and harbours that facilitate over one million leisure craft and yachts.

www.britishports.org.uk

Port Futures

The British Ports Association Port Futures Programme is a series of papers considering emerging and innovative trends in the port sector. During this rather unusual and challenging time, UK ports are under incredible pressures both to ensure critical business operations continue and to support and maintain their workforces in doing so. The British Ports Association has asked TT Club to compile workplace guidance, which port and terminal operators could consider as a part of their risk assessments and management plans during the COVID-19 outbreak.

www.britishports.org.uk/Port-Futures

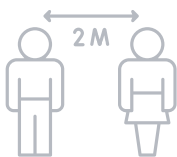


As designated “key” worker operations through the COVID-19 outbreak, port and terminal businesses will continue to operate with a view to maintaining the vital flow of goods through the international supply chain.

As highlighted in the recent Hill Dickinson paper, continued operation in these extraordinary times has the potential to give rise to liability exposures where operators do not act prudently to safeguard the wellbeing of their workforce. It currently remains unclear exactly how long this period will last, although it now seems likely to be months rather than weeks. Early temporary measures put in practice may now require a greater degree of risk management to ensure the ongoing welfare of the workforce.

Whilst not exhaustive, TT Club has compiled workplace guidance, which operators could consider as a part of their risk assessment/management plan during the COVID-19 outbreak.

Social distancing



Port operators must continue to implement and keep abreast of social distancing protocols in all areas of the operation. For many this will present a number of challenges, not least the ability to create additional physical space in the workplace to accommodate the required distance. While specific government guidance continues to be produced, this may require repositioning workstations, reducing the number of the workforce on each shift or facilitating a degree of remote working (likely a combination of all).

This may lead to a requirement for additional temporary workstations and power sources, and workers may need to operate in unfamiliar areas and surroundings. Robust management controls should remain in place and such changes will likely warrant the undertaking and communication of additional risk assessments, with the workforce receiving effective training on any resultant procedural changes.

Depending on the nature of your operation, it is likely that contractors will continue to visit your facility and interact with your workforce. You should assess your specific operational requirements in this regard and develop a practical and robust procedure to handle such interactions, whilst maintaining the social distancing requirements. It would also be prudent to develop and proactively communicate a protocol to handle exceptional circumstances - perhaps a clear escalation procedure to senior management to reach a considered and agreed solution.

A practical example that may prove problematic concerns physical document exchanges, including signing paperwork. Whilst practicing good hygiene, it may be possible to leave the paperwork in a defined location/desk to maintain social distancing. Another option is to sign, scan and email the documents to the recipient. Thirdly, if possible, email the documents ahead of the delivery (rather than hand them to the driver) to be signed, scanned and returned electronically. Ports should not underestimate the importance of processes around the flow of documents. Ensure that you engage with national industry associations to understand whether alternative practices have been adopted or agreed.

Cleaning facilities



Port operators should assess the current facilities available onsite and ensure that they are sufficiently accessible and numerous to allow the workforce to maintain adequate levels of cleanliness.

You should consider staff training to set expectations about how and when to use the cleaning facilities. Posters could be strategically placed as timely reminders, where appropriate.

In this regard, ports may find themselves procuring either new or additional volumes of associated products. Be mindful of the range of counterfeit goods currently flooding the market; care should be taken to vet suppliers. Ensure that adequate risk assessments are undertaken connected to the delivery, storage and handling of cleaning products – some will inevitably have hazardous properties.

Port operators may consider additional cleaning during this period. Where third-party cleaning companies are employed, it would be sensible to vet the company to ensure they are compliant with your requirements. If an existing company is requested to provide additional services, be mindful that they might need to bring additional staff on site who may not be familiar with your safety systems. It would be prudent to hold discussions with the cleaning company to ensure that adequate training/site inductions are conducted as required.

Personal protective equipment (PPE)



Guidance from authorities on the usage of PPE and face-coverings is dynamic and constantly being updated. Port operators will therefore need to assess carefully the potential risks their workforce are exposed to and consider (a) what PPE is available and (b) how appropriate it is to implement revised PPE protocols.

The Government's 'Our plan to rebuild', published in May, advises that people should aim to wear a face-coverings in enclosed spaces where social distancing is not always possible and they come into contact with others that they do not normally meet.

As is the case with cleaning products, ports may also find themselves procuring new or additional volumes of PPE and should be mindful of the exposure to counterfeit products. Again, care should be taken to vet suppliers and ensure that risk assessments are undertaken concerning the provision of adequate products. For example, there are more dermatologically sensitive options where rubber gloves are concerned.

Where ports implement protocols concerning PPE, consideration should be given to training on the use and fitting of the equipment to ensure it is as effective as it can be. Adherence to policies regarding the wearing of PPE should be regularly and systematically monitored to ensure compliance.

Shift changeover periods



These periods of the working day are critical safety pinch points in many operations and serve multiple functions. In the context of the COVID-19 outbreak, consideration should be given to building in additional operational downtime to sanitise equipment between shifts, where appropriate. Forklift trucks for instance may need to be disinfected around the steering wheel and machine controls between shifts.

In many operations, these periods are also used as a platform to share operational details of the previous shift and to highlight any safety incidents or near misses. Such feedback and instruction are vital and may provide an opportunity to deliver additional messaging/reminders about changes to management or operational protocols.

Toolbox talks are also often held during the shift changeover period and it is important to allow sufficient time for these to support the continuity of safety culture.

With social distancing in mind, video conferencing could be explored as a means of conducting the shift changeover without the physical interaction of the two shifts.

Communications



It is vital throughout this period to establish open communication with all members of the workforce. Communication is a two-way function. There is obvious importance in being able to effectively communicate your expectations to the workforce, as changes to procedure will be perhaps inevitable. It is also critical to establish a feedback channel, ensuring that workers are able and confident to undertake their duties. Typically, operational staff will be best placed to provide invaluable feedback on any changes implemented and suggest improvements. Be alert to the possibility that a change in one safety procedure has a detrimental impact on another.

The importance of effective communication is heightened further where remote workers are concerned; are they able to complete their duties, do they need additional support or equipment? It is crucial, where possible, to create a community feel within the workforce who are working remotely. Inclusion is an important factor to avoid situations where members of the workforce feel isolated and unimportant. Encourage regular verbal (and, where possible, visual) communication opportunities within teams and functions. Such occasions can also be used to remind them of business critical protocols, escalation procedures and general remote working advice (such as the ergonomic positioning of their home work station).

Industry and governmental guidance

There is a wealth of good practice guidance available across all sectors, much of it aimed at promoting health and wellbeing. Port operators should assess what information is available and most appropriate for their operation and seek to use the often freely available information/posters as a means of promoting an improved and informed safety culture in the workplace. TT Club has built a bank of such resources at its dedicated webpage: <https://www.ttclub.com/news-events/coronavirus-guidance/>

Health and wellbeing



The health and wellbeing of your workforce will no doubt be a high priority through this period. We have already considered above the practicalities of cleaning and wash facilities. Where possible, ports may wish to consider a more structured health screening of members of the workforce moving forwards. This will ensure that any symptoms are identified at an early stage and appropriate action can be taken to reduce the potential for wider infection amongst the workforce.

Such screening may also be effective in determining the point at which any members of the workforce showing symptoms contracted the virus. Whenever health screening is employed, it is critical to ensure that adequate records are maintained.

Within each operation, there may be members of the workforce who are more vulnerable to contract the virus and perhaps even designated as a highly vulnerable person. A number of factors will determine vulnerability, but to date primary factors are age and

underlying medical conditions. Port operators should be mindful of the need to support vulnerable members of the workforce. Where such individuals are not mandated to stay at home, consider introducing practicable measures to ensure that they are given suitable duties to mitigate their potential exposure. This may include remote working.

Similarly, consideration should be given to forming a practicable support protocol for those members of the workforce who show symptoms and/or contract the virus and are required to remain away from the workplace.

Mental health and stress are subjects that have been considered and discussed more openly in recent years. There is a greater understanding and appreciation of the risks surrounding mental health in the workplace. Port operators should be mindful throughout this period that individuals may experience additional stress away from the workplace. Concerns about their own health, the health of their family, relatives and friends, financial concerns, job security and not being able to access their ordinary means of recreation (sports, clubs, activities, social interactions) will all be mounting.

These circumstances also have the potential to affect the quantity and quality of sleep that members of the workforce are able to obtain. For example, where a night shift worker is required to contact medical or banking businesses who are themselves over stretched and only available during normal business hours, it may be necessary to remain awake longer than usual. Workplace fatigue is a widely recognised concern in many industries; port operators should be vigilant throughout this period to ensure that members of the workforce are adequately rested and are empowered to discuss concerns they may have about fatigue.

Altered shift patterns



As a result of either the need to cover additional periods of the working day or a lack of available workforce due to illness/self-isolation, there may be a business need to introduce or alter the current shift patterns.

Operator fatigue has the potential to be a major contributor to incidents in the workplace. It affects judgement and increases the likelihood of incorrect decisions, thus increasing risk. The capabilities of individuals should be considered when implementing any changes to shift patterns.

Humans have a natural drive for sleep at certain times of the day (the Circadian rhythm). Melatonin levels (sleep hormone) increase and decrease through the 24-hour period and are affected by daylight and dark hours, forming part of the body's natural routine. Any disruption to this routine effectively sees the body working against its own biological processes and arguably leaves us more prone to error and poor decision-making. Other potential side effects are memory lapses, reduced risk perception and consequently an increased risk of accidents.

Whilst these principles never fundamentally change, those who habitually work night shifts develop a tolerance. Caution should be taken for example in altering a habitual day shift worker onto night shifts as they are likely to be more susceptible to the symptoms mentioned above.

For more information visit:

<https://www.hse.gov.uk/humanfactors/topics/fatigue.htm>

Remote working



Many ports will likely require some of their workforce to work remotely (generally from home). There is a fundamental need to provide support, equipment and IT infrastructure to enable remote working. Guidance/good practice as to how, when and where to work in the home environment should be considered, recognising that each individual is likely to have work around their own unique circumstances.

Port operators could consider encouraging the sharing of both good and bad practices and experiences such that there is more open communication about issues of concern.

Good practice surrounding general housekeeping, trip hazards (extension cables) and fire hazards are all applicable in the home working environment and could be reinforced at this time. Depending on expectations of remote workers, it may be appropriate to remind/reinforce internal control procedures around repetitive tasks, manual handling techniques and lone worker provisions on a regular basis.

This will serve to promote good practice, even in the home working environment and may prompt individuals to give greater thought to their safety in their new and unique working environment.

Conclusion:

- BPA/Hill Dickinson have highlighted the key point that not all workers are able to work remotely.
- With many in the transport and logistics industry designated as “key workers” it’s more important than ever for port operators to support their staff and ensure that all risks are managed – be it in Ports as mentioned in BPA/Hill Dickenson article or otherwise.
- TT Club is committed to supporting its Members in this effort and are continuing to create FAQs and collecting pertinent resources at <https://www.ttclub.com/news-events/coronavirus-guidance/> to guide best practice...

