

## OVERVIEW

The risk of COVID infection must be managed by following the right controls, including:

- social distancing
- hand hygiene
- surface washing
- using screens and or barriers to separate people

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## FACE COVERING

In the context of the coronavirus (COVID-19) outbreak, a face covering is something which safely covers the nose and mouth. Cloth face coverings and disposable face coverings work best if they are made with multiple layers and form a good fit around the face.

Face coverings should be made of a material that you find comfortable and breathable, such as cotton. Bandanas or religious garments may be used but are likely to be less effective if they do not fit securely around the face.

Face coverings are not classified as PPE (personal protective equipment) which is used in a limited number of settings to protect wearers against hazards and risks, such as surgical masks or respirators used in medical and industrial settings.

Face coverings are instead largely intended to protect others, not the wearer, against the spread of infection because they cover the nose and mouth, which are the main confirmed sources of transmission of virus that causes coronavirus infection (COVID-19).

Face coverings are not classed as personal protective equipment (PPE) because, (1) there is currently no need to conform to a manufacturing standard, (2) they do not provide protection for work risks such as dust and spray.

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## WHERE ARE FACE COVERINGS REQUIRED?

Face coverings are required in all indoor public places and on public transport (including taxis). This includes a very wide range of locations, such as shops and shopping centres, places of worship, hairdressers and salons, cinemas and museums, gyms and leisure centres, and anywhere that is open to members of the public. It also includes anywhere you go to eat or drink, like restaurants, pubs or cafes (until you are seated). It would also include any public areas within buildings that are otherwise closed to the public – for example a reception area of an office building.

### Shops and other premises

- Retailers are playing a vital role during this pandemic – it is imperative that they operate in the safest way possible to safeguard their customers and employees alike.
- Signs are now required to instruct members of the public on premises what they are required to do to stay safe and protect others.
- Stricter enforcement on the wearing of face coverings is measure that and shops and other premises employ, they are able to set their own policies and standards on how this is implemented.

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## RISK POLICY GUIDANCE

The Welsh Government has issued guidance to shops and other settings as to how the face coverings rule should be applied sensitively for people with exemptions.

However, it is recognised that in certain circumstances there is a need to examine the propensity for situation to quickly become confrontational if continuity and consistency are not applied.

Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches.

For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.

Below is a risk assessment based upon recent activities undertaken where issues around the removed of face coverings has increased the likelihood of conflict situations.

The Likelihood (L) of the hazard occurring is calculated using the following criteria:

- 1 - Rare
- 2 - Unlikely
- 3 - Probable
- 4 - Very Likely
- 5 - Certainty

The Severity (S) of harm caused by the hazard is calculated using the following criteria:

- 1 - No injury
- 2 - Minor injury (no time lost)
- 3 - Time lost up to 3 days
- 4 - Time lost above 3 days
- 5 - Severe injury/death

The level of Risk (R) is calculated by multiplying the likelihood and severity as follows:

- Risk Rating - 1 - 6 - Low Risk
- Risk Rating - 7 - 14 - Medium Risk
- Risk Rating - 15 - 25 - High Risk

	HAZARDS	WHO MIGHT BE HARMED	INITIAL RISK RATING	IS THE RISK ADEQUATELY CONTROLLED?	WHAT FURTHER ACTION IS NECESSARY TO CONTROL THE RISK?	FINAL RISK RATING
<b>BREAK DOWN THE TASK INTO ITS COMPONENT ACTIVITIES.</b>	<p>Look only for hazards which you could reasonably expect to result in significant harm under the conditions in your workplace. Use the following examples as a guide: -</p> <ul style="list-style-type: none"> <li>• Slipping/tripping hazards</li> <li>• Noise</li> <li>• Electricity</li> <li>• Fume</li> <li>• Fire</li> <li>• Covid 19</li> <li>• Vehicles</li> <li>• Dust</li> <li>• Conflict</li> <li>• Violence</li> <li>• Chemicals</li> <li>• Moving parts of machinery</li> <li>• Manual Handling</li> <li>• Work at height</li> <li>• Ejection of materials</li> <li>• Poor lighting</li> <li>• Pressure systems</li> <li>• Low temperature</li> </ul>	<p>There is no need to list individuals by name - just think about groups of people doing similar work or who might be affected e.g.: -</p> <ul style="list-style-type: none"> <li>• Office staff</li> <li>• Operators</li> <li>• Maintenance personnel</li> <li>• Cleaners</li> <li>• Contractors</li> <li>• Members of the public</li> <li>• People sharing your workplace</li> </ul> <p><b>Pay particular attention to:</b></p> <ul style="list-style-type: none"> <li>• Persons requiring additional support</li> <li>• Young persons</li> <li>• Inexperienced staff</li> <li>• Visitors</li> <li>• Lone Workers</li> <li>• Those that may be Pregnant</li> </ul>	<p>Prioritise risk as high, medium or low</p>	<p>Have you already taken precautions against the risks from the hazards you listed, for example: have you provided? -</p> <ul style="list-style-type: none"> <li>• Adequate information, instruction or training?</li> <li>• Adequate safe systems or procedures?</li> </ul> <p><b>Do the Precautions: -</b></p> <p>Meet the standards set by a legal requirement?</p> <p>Comply with a recognised standard?</p> <p>Represent a good practice?</p> <p>Reduce risk as far as reasonably practicable?</p> <p>If so, then the risks are adequately controlled, but you need to indicate the precautions you have in place. You may refer to procedures, manuals, etc. giving this information.</p>	<p>What more could you reasonably do for those risks which you found were not adequately controlled?</p> <p>Priority should be given to those risks which affect large numbers of people and/or could result in serious harm. Apply the principles below when taking further action, if possible, in the following order: -</p> <ul style="list-style-type: none"> <li>• Remove the risk completely</li> <li>• Try a less risky option</li> <li>• Prevent access to the hazard (eg Security Staff)</li> <li>• Organise work to reduce exposure to the hazard</li> <li>• Use personal protective equipment</li> </ul>	<p>Prioritise risk as high, medium or low</p>

	HAZARDS	WHO MIGHT BE HARMED	INITIAL RISK RATING	IS THE RISK ADEQUATELY CONTROLLED?	WHAT FURTHER ACTION IS NECESSARY TO CONTROL THE RISK?	FINAL RISK RATING
<b>List Activities here:</b>	<b>List hazards here:</b>	<b>List groups of people who are especially at risk from the significant hazards which you have identified:</b>	<b>Initial Risk</b>	<b>List existing controls here - or note where the information may be found:</b>	<b>Describe the action needed to improve matters where it is reasonably practicable to do more to control risks. Specify also the target date for action and the person to action.</b>	<b>Residual Risk</b>
Security regarding the use of licence premises	None use of face coverings will increase the spread of Covid 19	<ul style="list-style-type: none"> <li>• Security staff</li> <li>• Members of the public</li> </ul>	High	<p>Face coverings</p> <p>Security staff issued individual face coverings, to be used if 2m social distancing can't be achieved.</p> <p>Members of the public gaining access are required to wear face masks at all times when not seated.</p> <p>Security staff to control social distancing, i.e., ask to remain at a 2m distance</p>	With the confines of the licenced premise, it would be impossible to control and or recognise those persons who are by means exempt for the conditions surrounding face coverings. Therefore, additional control measures must be put into place to safety control the potential risks highlighted within the additional assessment breakdown	-
Control of activities within a licensed premise, and the potential spread of COVID 19	<p>Admission to licensed premises for those not wearing face covering</p> <p>Potential conflict situations arising from those who refuse to follow the guidance.</p> <p>Misunderstanding leading to conflict situation whereby a person cannot be identified as exempt from wearing face covering</p>	<ul style="list-style-type: none"> <li>• Security staff</li> <li>• Management and premises staff</li> <li>• Members of the public using the premises</li> </ul>	High	<p>Face coverings</p> <p>Security staff issued individual face coverings, to be used if 2m social distancing can't be achieved.</p> <p>Members of the public gaining access are required to wear face masks at all times when not seated.</p> <p>Security staff to control social distancing, i.e., ask to remain at a 2m distance</p>	<p>That face coving, to remain a mandatory control for all those using the premises.</p> <p>Those who demonstrate exemption will be requested to follow the basic instructions so that, when entering, leaving or traversing premises, face coving must be used. This will greatly reduce the need to manage potential conflict situations arising for confusion over who should be using face coverings.</p> <p>When seated for the consumption of food and or drink face covering may be removed, and physical distancing maintained.</p> <p>Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches. For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.</p>	-

Control of activities within a licensed premise, and the potential spread of COVID 19	Those traversing through the premise not wearing face covering	<ul style="list-style-type: none"> <li>• Security staff</li> <li>• Management and premises staff</li> <li>• Members of the public using the premises</li> </ul>	High	<p>Face coverings</p> <p>Security staff issued individual face coverings, to be used if 2m social distancing can't be achieved.</p> <p>Members of the public gaining access are required to wear face masks at all times when not seated.</p> <p>Security staff to control social distancing, i.e., ask to remain at a 2m distance</p>	<p>That face coving, to remain a mandatory control for all those using the premises.</p> <p>Those who demonstrate exemption will be requested to follow the basic instructions so that, when entering, leaving or traversing premises, face coving must be used. This will greatly reduce the need to manage potential conflict situations arising for confusion over who should be using face coverings.</p> <p>When seated for the consumption of food and or drink face covering may be removed, and physical distancing maintained.</p> <p>Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches. For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.</p>	-
Control of activities within a licensed premise, and the potential spread of COVID 19	Those that refuse to wear face coving or adhere to social distancing and seating arrangements that have been allocated	<ul style="list-style-type: none"> <li>• Security staff</li> <li>• Management and premises staff</li> <li>• Members of the public using the premises</li> </ul>	High	<p>Face coverings</p> <p>Security staff issued individual face coverings, to be used if 2m social distancing can't be achieved.</p> <p>Members of the public gaining access are required to wear face masks at all times when not seated.</p> <p>Security staff to control social distancing, i.e., ask to remain at a 2m distance</p>	<p>Failure to abide to the control measures of seat allocation could lead to potential breaches of current Covid 19 rules and will also increase the potential for conflict situations.</p> <p>In all cases this must be managed by those undertaking security duties.</p> <p>Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches. For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.</p>	-

## FACE MASK RULES FOR CUSTOMERS

Review of policy date – when there is new evidence or a relaxation of the current levels or restrictions in relation to covid 19

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### POLICY OVERVIEW

Conflict arising from customers that do not want to wear face masks in on an upward rise, however within the premise you have a discretionary right to enforce control measures, when these matters concern elements of health and safety, then you have a duty of care to enforce the control measures. We already adopt many control measures that are advisory upon admission, dress codes, etc, as well as the Mandatory control of age restricted products, challenge 21 and refusal of service of alcohol.

As well as managing the above, we have a duty to ensure we treat everyone equally, and therefore not discriminate on any grounds.

**Within the control of Face coverings face we have two eliminant consider.**

1. The mandatory control issued under the guidance for the control of the spread of Covid 19.
2. to adhere to prescribed characteristics under the equality act.

In this instance we must exam the risk assessment for other potential dangers that could arise when adopting a policy that is mandatory to all, and therefore include additional measures that help manage wellbeing, good practices, as our legal standing.

Therefore, we look to adopt the following policy that we deem both fair and safe to practice.

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### POLICY

#### 1. MANDATORY CONDITIONS FOR THE WEARING OF FACE COVERINGS

- 1.1 Face covering are a mandatory requirement for entering this premises.
  - 1.2 Face masks must be worn all times other than when seat for the consumption of food and/or drink.
  - 1.3 Failure to comply could lead to refusal of entry.
  - 1.4 In high-risk situations, failure to comply could lead removal from the premises, and in extreme cases can lead to on-the-spot penalties and possible arrest. Guidance below - <https://gov.wales/alert-level-2>
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#### 2. PERSONS IN BREACH OF THE MANDATORY CONDITIONS

- 2.1 Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches.
  - 2.2 For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.
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#### 3. EXEMPTIONS FROM WEARING FACE COVERINGS AND THE PROPOSED CONTROL MEASURES

- 3.1 As conditions within the premises allow for the removal of face coverings when seat for the consumption of food and/or drink. The following guidance has been adopted as a safe control measure.
  - 3.2 Upon entry to the premise, and traversing the premises, those who can clearly identify exemption upon medical grounds will asked to comply with the face covering rules for the short period of time taken to traverse to a seated area, or any other area within the premises where face masks must be used.
  - 3.3 This is to ensure an element of continuity within the premise and avoid potential conflict situations whereby other members of the public and/or staff would be unable to distinguish those that are exempt from wearing face covering to those that are removing them at will and therefore increasing the potential spread of covid 19.
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#### 4. REFUSAL TO WEAR FACE COVERINGS

- 4.1 In circumstances whereby customers refuse to wear face covings, or falsely claim exemption, the following actions are recommended.
  - A warning given
  - Refusal of entry into the premises.
  - Removal from the premises
  - whereby a persistent offence occurs, the person could be subject to a penalty notice, on the spot fine, or possible arrest - Guidance below - <https://gov.wales/alert-level-2>
- 4.2 Where there is a breach of the law, persons may be told to go home or removed from where they are and returned home. They could be asked to pay a fixed penalty notice of £60. This will rise to £120 for the second breach and continue to increase for further breaches.  
For more serious offences, penalties start at £500. Or criminal proceedings brought against a person, and if found guilty, to pay a fine.

## 5. NOTE OF MANDATORY CONDITIONS

5.1 It is recommended that signage be used to remind customers of the control measures. These can be displayed at the entrance to the premises, within the premises, 5.2 upon advertainments relating to the premises.

5.3 Some examples can be found here <https://www.zenefits.com/workest/download-free-printable-face-mask-required-signs-for-your-businesses/>

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## 6. GUIDANCE AS THE REMOVAL OF FACE COVERINGS IN EXTREME CIRCUMSTANCES

6.1 The Centre for Disease Control and Prevention recommends that these groups of people should not wear a face covering

- Anyone with trouble breathing
- Anyone who is unconscious or incapacitated