

What to consider when re-opening after extended closure

Risks and challenges in the sports and leisure industry after COVID-19

Re-opening sports and leisure venues which have remained closed during the COVID-19 lockdown will be cause for celebration when it is safe to do so, but clubs and businesses also need to be aware of potential risks and challenges. These range from the heightened threat of legionella in buildings that have been shut for a long period, to the challenge of adapting to new social distancing rules as the lockdown is eased.

What can sport and leisure businesses do now to prepare for re-opening?

Europe-wide scientific group ESGLI (ECSCMID Study Group for Legionella Infections) has released advice on how to prevent legionella in buildings which have been closed¹.

This includes:

1. All water outlets in hot and cold systems should be used or flushed at least once a week to maintain a degree of water flow and minimise stagnation. Taps should be turned on for a gentle water flow, not at full force to avoid excess splashing, for 2 or 3 minutes. Toilets can be flushed with the lid down or covered for those without a lid. Showers could be flushed using a plastic freezer-type bag, secured with an elastic band above the shower head and with a cut from the bottom of the bag.
2. To manage risks during non-occupancy, consideration should be given to implementing a suitable flushing regime, or other measures, such as draining the system. Especially if it is to remain vacant and unused for a long period (particularly important for leisure, sports, swimming and spa pool facilities). However, it should be considered that moisture may remain in the system, enabling a biofilm to develop where there are pockets of water or high humidity.
3. Avoid debris getting into the system (ensure that any cold-water tanks have a tight-fitting lid).
4. Where hot water must be stored, set control parameters (set the temperature of the hot water cylinder to ensure water is stored at 60 °C). This water must then be distributed so that it reaches a temperature of 50 °C (55 °C in health-care premises) within one metre at outlets (scalding risks to be considered by using thermostatic valves).
5. Dismantle, clean, and disinfect shower heads frequently, preferably monthly, if regular weekly flushing is maintained.

¹ https://www.escmid.org/research_projects/study_groups/legionella_infections/

6. Some businesses may have a specialist contractor to undertake aspects of the operation, maintenance and control measures required for their water systems. While these contractors have legal responsibilities, the ultimate responsibility for the safe operation of the system rests with the employer. If you have such a contract, it should be maintained during the period of lock-down.
7. Before return to use, the system must be thoroughly flushed, and cleaned and disinfected, where possible, especially if weekly flushing has not been maintained. Where drained, the system should be refilled and disinfected and all hot water storage tanks to be heated to 60 °C².

It may be that you have shut down equipment over the period your premises was closed. To ensure safe start-up of equipment you should:

- Constantly attend and monitor the equipment during the start-up process.
- Remove any accumulations of dust that could contribute towards overheating/fire.
- Check fluid levels such as oil or cooling water.
- Ensure any safety systems are operational.
- Ensure any combustible materials that may have been moved near the equipment during shut-down are removed.

Managing, preventing and controlling risk

The HSE requires businesses, including sports clubs and venues, to identify management responsibilities with regard to managing risks and to put contingency plans in place.

If the club has direct employees then someone competent – a ‘responsible person’ – should be appointed to help meet health and safety duties and take responsibility for controlling any identified risks. This person could be inside or outside of the club or venue. For all clubs, we recommend that someone takes responsibility for coordinating the management of risk and keeps records of the steps taken to mitigate these (businesses with five or more employees are required to keep records of any significant risk and this is good practice for all businesses).

Post-pandemic considerations

Until a vaccine for COVID-19 is found, buildings may require significant alterations to enable clubs to manage infection risk.

A report by *Keystone Law* in April 2020 identified a range of issues to consider³:

- Overcrowding indoors will need to be avoided. Some clubs and venues may need to appoint supervisors to ensure customers and members are practising safe distancing.
- Temperature testing may be used to check users of the premises are not infected. So, consider early whether enough infra-red forehead thermometers are available to meet demand. If temperature checks are required, door supervisors or staff members will also be needed to take and record temperatures and to deny access to those with signs of infection. Training may be required.

² https://www.esccmid.org/fileadmin/src/media/PDFs/3Research_Projects/ESGLI/COVID_buidling_water_system_guidance_27_3_20_v4_DS.pdf

³ <https://www.keystonelaw.com/keynotes/coronavirus-and-the-leisure-industry-preparing-for-the-end-of-lockdown>

- The UK public has been used to not using cash during the lockdown. Are your payment systems able to cope?
- Hygiene and sanitisation will be key measures in all premises where the public congregate.
- Consider now whether you might need to make changes to any licences when the clubs and venues re-opens. Operators may wish to consider varying hours or conditions or seeking approval to make structural alterations whilst premises are closed.

With regard to training and active sessions, you may wish to consider the following additional points:

- You should keep a register of anyone attending a training session to help manage “track and trace” if an infection is reported by someone present.
- Care should be taken with regard to sharing of equipment and other items, such as water bottles. Handling shared items and then touching the face is one way the virus spreads.
- Potentially there is a risk of increased droplet spread when breathing hard during exercise or moving quickly, compared to when people are breathing normally and are stationary or moving slowly. It is sensible wherever possible to maximise the distance between people when doing training.
- Have you considered how COVID-19 affects how you would administer first aid? St John’s Ambulance provides advice on what to consider at <https://www.sja.org.uk/get-advice/first-aid-advice/covid-19-advice-for-first-aiders/>
- Remember your safeguarding policy. It is important that everything you do is aligned with existing policies intended to protect members, coaches and employees.

- Finally, what do you do if someone is not complying with the actions you’ve taken to manage the risks of COVID-19? It is sensible to have agreed actions to deal with unacceptable behaviour before an incident occurs.

Advice, regulations, and insurance

The Health and Safety Executive <https://www.hse.gov.uk/> provides regulation and guidance on health and safety in the workplace. Its web pages include special advice related to COVID-19, details of health and safety related laws, plus advice on how to manage risk.

Risk assessments

The first step in making your workplace ‘COVID-19 secure’ is to complete a risk assessment and review existing policies, such as your infection control policy (if you have one).

COVID-19 is a biological hazard, and like any workplace hazard, appropriate control measures will need to be put in place to reduce the risk of someone being infected. Normally, the goal is to eliminate hazards where possible; however, unlike a faulty piece of equipment, the virus cannot simply be removed. Instead, the aim is to introduce suitable and sufficient control measures to reduce the risk of contracting the virus to as low a level as is ‘reasonably practicable’. In other words, precautions should be implemented, but the time, cost and effort involved in implementing a control measure should be reasonable, when compared to risk posed by what you are controlling.

The government’s new safe working guidance outlines, by sector, what controls are appropriate and how to implement them. Based on these guidelines, your COVID-19 risk assessment should consider the following actions and you should record what you are doing, specific to your premises, to manage the risk. Remember to keep up to date with guidance from government and your National Governing Body, as this will continue to evolve.

What is the risk?

Spread of the virus

Who can be affected?

Members, visitors, coaches, teachers, instructors and employees.

The following are suggested actions that you could take to manage the risk of the virus spreading. You should apply these to your own premises, as the action taken by any club will depend on your particular circumstances. Not all will be applicable to your particular club or venue and there may be risks specific to your own premises that need to be considered in addition.

Action to be considered

Action taken (to be completed by the club)

An appropriate gap should be maintained between members, employees, coaches and visitors and any other persons that may be affected by the work activity

Are screens needed at reception and/or customer-facing areas?

Can seating areas be reorganised to ensure social distancing can be maintained?

Are appropriate provisions in place to ensure social distancing can be maintained in office, delivery and eating areas?

Are provisions in place to ensure testing can be completed?

Are appropriate handwashing facilities in place, including hot and cold running water, soap and disposable hand towels? Alternatively (or additionally) is sufficient hand sanitiser available at appropriate locations?

Are disposable tissues available to reduce the threat of transmission?

Action to be considered

Action taken (to be completed by the club)

Is there an effective action plan in place to deal with someone with suspected symptoms, should it be necessary?

How can you ensure appropriate areas such as hand-contact points, including any shared equipment, are disinfected to prevent spread?(consider what to do and how often)

Are you able to display education pieces, such as a symptoms chart and handwashing guidance, throughout the workplace to raise awareness and promote safe practices?

How can you plan to monitor employees' health and wellbeing?

How can ensure you remain up to date with the latest guidance from government, public health and your National Governing Body?

Contractors and visitors need to be managed appropriately. Have you considered potential control measures, which may include only allowing essential work to take place, providing handwashing facilities and ensuring social distancing is maintained?

Consider employees use of face coverings. Employees should be allowed to wear face coverings, along as it does not affect other PPE use and therefore put them at increased risk.