COVID-19 Re-Opening: The 11 Things to Include in Your Social Distancing Policy



Whether your business is essential or non-essential, complying with social distancing requirements will be the only way it will be allowed to re-open and stay until the COVID-19 pandemic officially ends. Of course, the idea of making everybody in the workplace keep the necessary 6 feet/2 meters apart is a novel challenge that requires a new kind of safety policy. But while the concept of the social distancing policy didn't exist a few scant weeks ago, best practices about how to create and implement one are quickly emerging. Like our Model, your social distancing policy should include 11 provisions.

1. Policy Statement

Start with the essential message: Everybody must follow social distancing rules. Those who don't will be kicked out of the facilities and, if they're an employee, subject to discipline the way they would if they committed any other health and safety offence (Policy, Sec. 1).

2. Policy Purpose

State that the purpose of the Policy is to prevent the spread of COVID-19 and ensure that social distancing is carried out in a manner that complies with OHS laws, current government emergency orders and public health guidelines (Policy, Sec. 2).

3. Which Close Contacts Must Be Reported

For social distancing to work, there must be a way to track when encounters closer than the permitted 6 feet/2 meters take place. One potential answer is surveillance cameras or the use of so apps, wearables and other so called "contact tracing" solutions for monitoring encounters in real time. But these tech solutions be more costly, cumbersome and privacy-invasive for many employers. Accordingly, our Model Policy is based on a simpler, manual approach in which individuals are required to self-monitor and report their close encounters.

You need a definition of which contact must be reported. Accept the fact that people are going to come closer than they're allowed at some point during the day, whether deliberately for legitimate reasons or because close contact is

just impossible to avoid 100% of the time. So, rather than every close encounter, require reporting only of those that last a prescribed amount of time; 10 seconds seems to be the best practice standard (Policy, Sec. 3).

4. Other Key Definitions

In addition to defining "social distancing," your policy should list definitions of two other key terms:

- Contacts that pose immediate hazard of infection which must be reported immediately regardless of distance and duration, e.g., one in which a person is sneezed or coughed on (which our Model labels "dangerous contacts"); and
- What our policy describes as "prolonged close contact," a kind of occupational exposure limit for total exposure to close contact (e.g., 15 minutes) in a single shift or visit requiring an organizational response and perhaps discipline.

(Policy, Sec. 3)

5. Who Must Practice Social Distancing

Don't confuse social distancing for just an employment policy. It's a broader health and safety measure that applies to every single person present in the workplace, including contract workers, couriers, customers, clients and visitors (Policy, Sec. 4).

6. Exclusion, Self-Isolation & Return to Work Standards

It's imperative to keep the sick and high-risk people out of the workplace and away from the well. In addition to considering COVID-19 medical screening to ensure entrants are healthy enough to go inside the facility, include key protections in your social distancing policy, including:

- A ban on employees coming to work if they have confirmed COVID-19, COVID-19 symptoms, dangerous or close contact with somebody who has COVID-19 or symptoms within the past 48 hours and/or have traveled outside Canada in the past 2 weeks;
- An obligation to disclose the above risk factors, something you're allowed to do during the pandemic despite the privacy implications;
- A description of the steps you can take in response to finding out that a person has COVID-19, symptoms or other risk factors, including ordering the person to leave and notifying others with whom he/she has had close contact within the past 48 hours; and
- The requirement that a person sent home or excluded from entry for COVID-19 remain in self-isolation and not return until all symptoms resolve in accordance with public health guidelines.

(Policy, Sec. 5)

7. Roles & Responsibilities

Set out the roles and responsibilities of management, supervisors, employees and other stakeholders in implementing the social distancing policy (Policy, Sec. 6).

8. Mandatory Completion of Contact Logs

Next, describe the mechanisms of your contact logging system, starting with the requirement that all persons complete a log reporting any close or dangerous contacts they had while at the premises, including the name of the person and approximate duration of close contacts in minutes and seconds and submit it to a supervisor or security person. Attach a copy of a blank form to your policy

(Policy, Sec. 7.1).

9. Contact Log Processing

Require the supervisor to process the logs to confirm that each employee present during the shift submitted one, check for any dangerous contacts and total the cumulative minutes and seconds of each employee’s close contact time (Policy, Sec. 7.2).

10. Response Actions

Require supervisors to immediately flag the OHS manager or HR of any dangerous or prolonged contacts for an organizational determination of whether to let the employee keep working at the site or order him/her to go into self-isolation. The supervisor should also follow up with any employee subject to prolonged close contact the very next shift to go over the social distancing rules, get the employee’s explanation and determine whether to impose discipline in accordance with company progressive discipline policies (Policy, Sec. 7.3).

11. Policy Duration

Last but not least, indicate that the Policy is only a temporary measure for the pandemic that will end as soon as the threat subsides and public health officials send the all-clear on social distancing. Also be clear that you have the right to amend the Policy to keep up with changes and ensure compliance with the latest version of the public health guidelines (Policy, Sec. 8).