



Post-coronavirus start-up guidance: Motor trade, covering showrooms, valeting, workshops & recovery

Motor trade premises with showrooms may now be permitted to reopen following the enforced Covid-19 partial or full shutdowns. In many cases business owners and staff will be returning to work and their premises for the first time in weeks. Reopening the business for trading and activating workshops, showrooms, recovery services and vehicle demonstrations needs to be planned to resume activities in a controlled and safe manner.

Each business will need to be individually risk assessed to establish specific needs, and the guidance given below covers some of the main areas to consider.

These guidelines do not override any existing policy conditions.

The fact that a business is deemed essential or is permitted to operate does not mean its legal obligations are in any way relaxed or reduced. Indeed, in the present climate the duties owed to employees and others are enhanced. All activities must only be undertaken in line with the current guidance issued by HM Government.

All applicable health & safety legislation and regulations remain fully in force, including but not limited to:

- Health & Safety at Work Act 1974.
- Management of Health & Safety at Work Regulations 1999.
- Workplace (Health, Safety & Welfare) Regulations 1992.
- Fire Safety Regulatory Reform Order 2005.
- The Road Traffic Act 1988.
- The Road Vehicles (Construction & Use) Regulations 1986.





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Risk management measures

Activities: It is important that a review of your working activities is undertaken before restarting any work, as this will form part of your Covid-19 Compliance risk assessment. You must carry out a suitable and sufficient risk assessment; this means looking at working areas and activities to enable your employees to successfully distance themselves from customers and colleagues and work safely. It may not be appropriate to carry out certain activities as you normally would and / or you may need to consider supplying PPE equipment to certain employees. Please see the latest Government and HSE advice for updates on appropriate precautions.

Please remember that if some activities cannot be carried out safely, they should not be undertaken at all.

You must reinduct your employees to ensure that they understand new restrictions, new rules and altered arrangements for using welfare facilities and you may need to operate out of hours and/or, introduce shift patterns in order to manage safely the social distancing elements of the Covid-19 guidelines.

Please click on the headings below for links to further information:

[HSE Coronavirus information](#)

[HSE Social Distancing Guidelines](#)

[Working safely during Coronavirus](#)

[HSE Working safely during Coronavirus](#)

Consultation

Employers should consult with employees and trade unions about the return to the workplace. In the meantime, staff should continue to work from home if they can.

Employers should keep up to date with the latest government guidance to help them plan.

When planning to return to the workplace, employers must:

- consult with staff and employee representatives, including any trade union representatives and health and safety officials
- consider the risks of anyone being harmed in the workplace and carry out a suitable and sufficient risk assessment
- make the workplace as safe as possible for staff, customers and other visitors.

Some employees may be anxious about their safety when returning to the workplace. Employers and employees should talk about any concerns and try to resolve them together. It can also help to signpost staff to any health and wellbeing support that is available, for example occupational health or mental health services.



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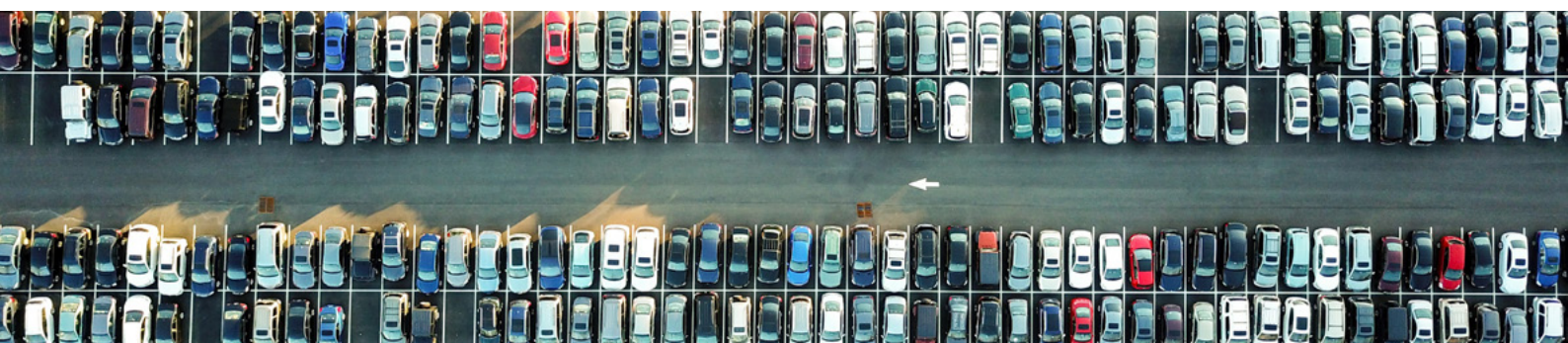
Risk assessment

You must consider and manage the following:

- Update your risk assessments and working practices in respect of the Covid-19 amendment.
- Confirm that your employees have had training refreshed in respect of Covid-19 for risk assessments and working practices.
- Confirm that you have, and can supply & provide, the correct PPE where this is required for work-related activities. Remember that some items of PPE are in very short supply – if this cannot be sourced, then activities depending on this must not take place.
- Ensure that all employees are symptom-free and have not been in contact within the last 14 days with someone who has had, or is suspected to have had, Covid-19, or someone who has been required to self-isolate with suspected Covid-19.
- In addition, anyone who is classed as a vulnerable person, through age, ill health condition, pregnancy, or who is a carer for someone who is vulnerable should remain away from work.
- Inform your insurer that you are operational and following specific guidance issued by HM Government and the HSE in respect of Covid-19.
- Confirm that all relevant insurance policies areas still in force and the limits of indemnity remain as before the crisis.

Car parks

- Ensure that social distancing in car parks can be achieved, by introducing a one-way traffic flow system, if not already in place.
- Ensure there are adequate directions and prominent signage.
- Use alternative parking bays to ensure social distancing.
- Reduce speed in car parks to 5 mph to protect pedestrians.
- Employees involved in directing car parking operations must wear high visibility clothing.
- Make sure that access and egress to car parks is managed in such a way as to maintain social distancing requirements.
- In line with the Government advice, be aware that increased cycle use is likely for both employees and members of the public. You must ensure that traffic management arrangements take account of this.
- You must train all your employees in the new procedures and share information with them regarding the risk assessment before the premises reopen.
- Make sure that they understand fully how to manage the social distancing guidelines.
- Ensure all vehicle deliveries are managed within the guidance above.





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Document the following:

- **Assess:** review all areas of work activity, look for contact points between employees and others, possibly any members of the public or delivery drivers and consider / re-assess if these can be managed within the current social distancing guidelines. Update your risk assessments to reflect any changes.
- **Train and inform:** communicate with your employees about what the new changes may mean, ensuring that they fully understand and above all document and record all training and information going forward.
- **Clean:** review welfare arrangements and facilities provided – can social distancing be achieved in washrooms and dry canteen facilities? You may need to stagger the use of these facilities and supervise or control access and egress.
- All actions, systems and procedures must be documented – you may be required to produce evidence of compliance to a regulator.

Cleaning – general guidance applicable to all locations

- Think about your business and the layout of your premises, prior to opening for business. If your risk assessment identifies cleaning is required before opening, you should only consider cleaning surfaces yourself if you have the correct protective equipment and materials to hand or these are readily available.
- We also understand that businesses may wish to use a service delivery option to do this work for them ahead of opening.

Prepare a schedule of cleaning steps covering the following:

- Access and egress routes – what could anyone have touched?
- Always work from clean to dirty areas to avoid spreading any contamination.
- Door handles, letterboxes, keys, vehicles, finger plates, keypads, glass surfaces and floors – these are just a few areas but may well differ from premises to premises, and internally across departments.
- Washrooms should be subjected to a deep clean, especially if they are available for public use.
- Phones, PC's, keyboards, desks, vending machines and PIN pads.
- Although the Covid-19 virus cannot survive long on hard surfaces it is advised these should be cleaned/sanitised thoroughly.
- Flush toilets, run taps and showers which have been unused for some weeks multiple times to minimise the risk of legionella.





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Showrooms & Vehicle Demonstrations

Think about the activities and how you limit your customer and employee exposure, ideally these need to be managed so that physical distancing can be exercised.

- It will be preferable to display vehicles outside the enclosed showroom in the open air, which means that vehicles may need to move in and out at the start and finish of the day. If the vehicles are displayed outside this should be in an area with appropriate physical and CCTV security and existing protection may need to be upgraded.
This will give rise to increased vehicle movements, sometimes in restricted space, and as such additional care will be required. Your risk assessment should be updated to reflect this increased vehicle movement. If it is not possible, due to weather or other factors, customer numbers and physical distancing must be maintained in showroom areas.
- All vehicles need to be cleaned and sanitised before use and between demonstrations – this will include wiping down internal/external surfaces, door handles, steering wheels, keys and key fobs – a cleaning schedule needs to be devised and followed, with clear instructions and training provided to all staff. Time needs to be allowed between vehicle use, and records kept of such activities.
- Notices need to be displayed outlining protections and steps being taken to protect both employees and customers.
- To ensure you comply with the distancing requirements and your staff safety, you will need a clear process for managing vehicle demonstrations, which will mainly be unaccompanied.
- Check that your insurance covers you and your customers for unaccompanied demonstrations.
- The use of your trade licence has been relaxed by the DVLA to include use during unaccompanied demonstrations.
- You need to manage this process with an appointment-only system, and ensure all documentation is agreed and signed-off prior to the arrival of the customer. Standard ID checks need to be in place and a moveable tracking device should be considered for security reasons. The route and timing of the demonstration should be agreed prior to the appointment and made clear to your customer.

Vehicle Delivery Demonstrators

- It may be appropriate to deliver the demonstration vehicle to the potential customer and allow them to trial it themselves.
- This must be managed, to ensure compliance with distancing for customer and staff safety. Include the points above and, in addition, conduct a pre-delivery telephone discussion with the potential customer, ensuring they are aware of, and will comply with, your instructions for a demonstration.

Valeting

- If your business is involved with valeting vehicles, either as a separate function or part of the demonstration or servicing process, you need to have a documented process in place to ensure the vehicles are cleaned in line with Covid-19 requirements. Training of operatives should be provided, and recorded, and your cleaning materials may need to be reassessed if they do not meet the above criteria.
- A system to identify vehicles that have been cleaned and sanitised should be adopted.



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Workshops

Reception of vehicles for servicing and delivery to the customer must follow a strict protocol, to ensure social distancing and keep reception and delivery employees safe.

- Provide employees with PPE, disposable gloves, hand sanitiser and wipes.
- Ensure vehicle technicians and parts/stores personnel can effectively distance themselves. This will take some careful planning and scheduling, for example different types of servicing activities and / or reduced vehicle activities. It could also mean staggering shifts to accommodate busy workloads and maintain social distancing during servicing operations.
- Consider whether any vehicle maintenance operations require 2 people – this may not be possible, and you may have to provide additional PPE, guidance and training if an activity is critical.
- Vehicle cabs and handles, steering wheel and touchpoints must all be wiped down before first use and at regular intervals thereafter.
- Ensure that customer courtesy vehicles are licensed for the road and have not been subject to a Statutory off-road notification (SORN) before the vehicle is driven.

Recovery Operations

- Ensure that any recovery vehicles are licensed for the road and have not been subject to a Statutory off-road notification (SORN) before the vehicle is driven.
- Ensure that the recovery vehicle is roadworthy and that pre-start vehicle checks have been carried out.
- Check that the vehicle lifting equipment and / or tail lifts are operational, are within the statutory test period, and have a valid test certificate.

Recovery operations must be carried out using the social distancing guidelines.

- Consider organising alternative transport for the vehicle occupants.
- If this is not possible, consider leaving the vehicle occupants in the vehicle, but not if it will compromise the safety operation of the recovery vehicle.
- If the vehicle occupants remain inside the vehicle, provide clear instructions on their actions while in transit.
- If possible, use an A bar to tow the vehicle rather than loading it onto the recovery vehicle.
- The driver must ensure social distancing when recovering vehicles and either remain in the cab while customer's personnel at the delivery point offload the vehicles themselves, or if he/she needs to use the winch, that social distance can be maintained during the delivery operation.
- It is critical that a thorough review of recovery options is carried out before the premises is opened, and that a risk assessment for the Covid-19 situation is completed for all scenarios. It may be likely that some cannot be managed, and you may have to limit what you can do safely, without putting employees or third-parties at risk.
- All recovery drivers must be thoroughly briefed and made aware of the new arrangements and outcomes of the risk assessment – all training and briefing must be recorded.



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Operational procedures, refresh induction and task talks

Given that normal business operations have been suspended for some time due to the Covid-19 restrictions, it is appropriate to ensure that, where practical, key operational rules and procedures are refreshed once employees return to work.

The frequency of task talks needs to be increased, especially for an initial period following the return to work, as employees need to understand that operational practices and policies have changed and this needs to be reiterated to ensure understanding.

Key areas to think about will be:

- Fire alarm testing and associated procedures.
- Fire points and the provision of portable fire extinguishers & hose reels.
- Premises security issues.
- Manual handling and lifting.
- Pedestrian and vehicular interfaces.
- Managing the public.
- Personal safety.





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Premises opening

Where the business has to be reopened following temporary full or partial shutdown, the following precautionary measures will assist in mitigating potential losses and further disruption:

- Undertake a thorough inspection of the perimeter security including fences, gates, doors, windows, shutters etc., to ensure they are undamaged and locking devices are serviceable.
- Inspect the building for any signs of damage or deterioration and arrange for remedial repairs as necessary.
- Fire alarm systems, access control, CCTV systems, intruder alarms, fire doors (including self closers), fire extinguishers, fire dampers and emergency lighting/signage and emergency exits should be checked and tested to ensure they are fully operational and, where required, arrange for a service or emergency visit to rectify faults.
- Review the alarm keyholders to ensure adequate coverage is provided and ensure the intruder and fire alarm system Alarm Receiving Centres are informed of any changes.
- Fixed automatic fire suppression systems, such as wet chemical systems to commercial cooking ranges, should be checked to ensure they are serviceable and when in doubt arrange a service visit by the installer.
- Where automatic fire sprinklers systems are installed, please refer to the separate detailed guidance note.
- Reinstating building services where they had been shut down (heating, air conditioning, power supplies etc.) and restarting processes, plant and machinery should follow the OEM procedures, through suitably trained and competent staff, to ensure this is undertaken safely to minimise hazards and avoid damage or injury.
- Where the incoming water supplies have been isolated at the stopcock and systems drained, reinstating and refilling should be conducted in a slow controlled manner, checking for any leaks and to avoid water hammer which can cause damage to pipes, connections and fittings.
- Resuming trading after a prolonged idle period may mean there are initially larger quantities of stock and supplies delivered to site until a normal routine can be re-established. This will need to be managed carefully and following considered:
 - » Do not block fire escape routes and exits.
 - » Items should be stored in designated areas and away from potential ignition sources such as boilers, electrical switchgear and battery charging etc.
 - » Storage heights should be carefully monitored to ensure they do not exceed that allowable for effective sprinkler operation.
 - » General housekeeping will need to be managed.
- Waste storage and removal should be carefully managed as part of general housekeeping on site, particularly in respect of any hazardous waste such as used oil or oil-soaked wipes/rags. Frequency of waste collections may be less than necessary until normal services are fully resumed. Where additional arrangements are made to remove waste build up, ensure you only use registered companies to avoid the potential risk of 'fly-tipping'.

To check that a company is registered, go to the following website using the following link:

<https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers>

- Taking shortcuts when reinstating utility services, or starting-up machinery that has been idle, should be avoided as this could lead to costly further disruption to the business.



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Workshop equipment start-up

All applicable health & safety legislation and regulations remain fully in force, including but not limited to:

- Provision and Use of Work Equipment Regulations 1998 (PUWER).
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER).
- Pressure Equipment (Testing) Regulations 2016.
- Electrical Equipment (Safety) Regulations 2016.

We recommend restarting of your workshop equipment is carefully planned and undertaken by suitably trained and experienced staff, in accordance with OEM guidelines as a minimum.

The following general guidance should also be considered:

- As operational staff may have been away from work for some weeks, provide refresher training in safe equipment operation and emergency procedures.
- Review, and where necessary update, previous fire risk assessments or other specific assessments such as DSEAR to ensure no procedural changes are necessary. For further information please visit <https://www.hse.gov.uk/fireandexplosion/dsear.htm>
- Check, and where possible test, the operation of equipment condition monitoring devices (vibration, pressure, temperature etc.) plus safety shutdown interlocks.
- Ensure any specific fire suppression and detection installed to protect equipment is serviceable, including both automatic and manual actuation.
- Check the levels and condition of lubrication and hydraulic oils.
- Check and test the correct running of local extract ventilation systems, for example in paint spray booths and vehicle exhaust emissions.
- Inspect pressure tanks and lines for damage or corrosion.
- Inspect and check any welding and cutting equipment (especially Oxy Acetylene) for damage prior to use, to ensure it safe to do so.
- Taking shortcuts when reinstating utility services, or starting-up machinery that has been idle, should be avoided as this could lead to costly further disruption to the business.

