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Proceedings of the Director of Factories, Boilers, Industrial Safety & Health,
Bengaluru

Sub: Management of COVID-19 Standard Operating Procedures (SOP) for factories

PREAMBLE:

The world is facing pandemic in COVID-19 and all efforts are being made to ensure the health and safety of the workers while at work in the factory through various guidelines and orders. Further, it is the general duty of the occupier of the factory to ensure so far as is reasonably practicable, the health of all the workers while they are at work in the factory. As many workers work at a place inside the factory, there is high chance of spread of COVID-19 and hence the occupier is expected to take all practicable steps and measures as well as disseminate the information to the workers to prevent the spread of the disease. In view of the same, it is very much necessary that the SOP as annexed to this order is published and brought in to force to prevent spread of COVID-19. The SOP shall be followed in view of ensuring the health of the workers at this time of COVID-19 as mandated under Section 7A(1) of the Factories Act, 1948 and issue orders that the SOP be displayed in the factory and followed in letter and spirit. Hence the order.

ORDER

In exercise of the powers conferred under the Section 108 (3) of the Factories Act, 1948 the Standard Operating Procedures (SOP) for management of COVID-19 in factories published in the official website https://esuraksha.karnataka.gov.in/ from time to time shall be displayed in the factory. The occupier shall ensure that the same is followed to comply with the provisions of Section 7A(1) of the Factories Act, 1948.

Director of Factories,

Boilers, Industrial Safety &

Health, Bangalore

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GOVERNMENT OF KARNATAKA Department of Factories, Boilers, Industrial Safety & Health

Management of COVID-19

Standard Operating Procedures(SOP) for **Factories**

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In view of the prevailing situation of Corona Virus Disease 2019 (COVID 19) across the world and in the State of Karnataka, the following guidelines shall be strictly followed in all the factories in the State.

1. Policy and procedure

1.1 Develop an Infectious Disease Preparedness and Response Plan

- Develop a COVID-19 taskforce in the workplace, so that this taskforce can lead protective actions against COVID-19. Members of participation committee, safety committees, safety officers, and the medical staff of the factory should be in the committee.
- Ensure proper representation from every section in the taskforce.
- The developed policy should clearly define the accountability and responsibility of committee members in writing so that the entire workforce is made aware of their responsibility (who is In-charge, who does what?) in terms of prevention, controlling mechanism, and handling suspected COVID-19 cases in the workplace.
- Communicating and implementing COVID-19 related policies and procedures with relevant parties in the factory through worker training, and targeted interventions relevant to assigned tasks.
- Regular review, coordination, and updates to the plan as COVID-19 outbreak conditions change, including as new information about the virus, its transmission, and impacts become available.
- Prepare a SOP related to receipt of raw materials, accessories, machines, tools, accessories, and any other goods into factory premises, including what is imported from outside the country. This policy should include a quarantine and checking area for what is brought into factory premises.

1.2 Develop, Implement, and Communicate about Workplace Protections

 Provide workers with a list of referrals to essential health services including health care facilities treating COVID-19, sexual and reproductive health care (including maternal health care services), and counseling, legal, medical, and shelter services for workers experiencing domestic violence. Ensure that the medical officers and welfare officers are trained to support workers in accessing these services if required.

1.3 Prepare factory medical staff with resources on COVID-19

- Have a detailed meeting with the medical staff if available to identify the gap in existing medical facility.
- Take immediate action to procure what's missing.
- Encourage all medical staff to educate themselves on COVID-19 guidelines from Ministry of Health and Family Welfare.

2. Preventive measures

The best way to control COVID-19 is to systematically prevent it from entering the workplace in the first place. In factories where it may not be possible to eliminate the COVID-19 outbreak due to the high density of workers in a small place, the most effective protection measure will be to use the "hierarchy of controls" to select ways of controlling workplace hazards. There are advantages and disadvantages to each type of control measure. In most cases, a combination of control measures will be necessary to protect workers from exposure to COVID19

2.1 Administrative Controls

Preventive measures before starting operation

- Establishing hand wash stations at the main gate with adequate number of liquid soaps; ensuring hand wash/sanitization for all the visitors and employees while entering into the factory.
- Ensure at least two meters distance from one tap to another.
- Hand washing stations should have clean, dry cloth, single-use towel or hand drier avoid reusable towels
- Checking workers and any visitor's temperature by using infrared thermometer/thermal scanning/ necessary health check-up of every employee who is entering into the factory by the factory medical team.

2.2 Disinfection Processes

- Factory should be completely disinfected prior to workers' entry to the factory.
- Using personal protective equipment (PPEs) such as disposable gloves protective suit and mask is mandatory when disinfection processes are implemented.
- Spraying disinfectant throughout the factory; routine cleaning is being continued with more attention to disinfect stairs' handrail, lift button, inside of lift, exit doors' handle, fire doors' handle, photocopy machines, first aid boxes, dining tables, pantry and production tools and equipment (such as trolleys, WIP storage shelves, baskets etc.
- The bottom of shoes should be sprayed with disinfectant while entering to the factory and ensure workers do not remain in bare foot in the production floor. If necessary, provide spare sandals for the production floor.
- All vehicles must be disinfected upon entry.

2.3 COVID-19 Management Guidance:

HR and administrative initiatives to reduce risk of COVID-19

 Allowing all employees to visit in-house doctors if available for any COVID-19 symptom, sending workers away from factory premises with leave if they have fevers.

- Ensuring social distancing is maintained during visits to the medical room/doctor, and facilities are disinfected after each worker visits.
- Establishing more hand wash stations throughout the factory with an adequate number of water taps and soap to facilitate frequent hand wash.
- Ensuring hand wash items in all the toilets always and encouraging to wash hands very frequently.
- Divide the lunch/dinner/prayer break into several shifts to avoid the large number of workers who gather at a time and place the same simultaneously.
- Change the working time to shift work; shift work schedules should take into
 consideration of workers with family responsibilities and their availabilities to take on
 certain shifts. Depending in safety and security circumstances related to commuting
 to and from work, factories should ensure that workers, specifically women workers,
 are not put at risk of violence and harassment.
- Change the attendance system of the fingerprint to the use of punch card attendance. If temporary registers are used, then the pens used should be wiped with hand sanitizers after each use.
- Ensure each worker carry individual drinking water bottles and maintain gap between the water tap and bottle.

2.4 Awareness and worker management communication

- Arranging awareness training for all employees could be arranged in smaller groups, where each members will be able to maintain social distancing during the session. Factory can create awareness on COVID-19 symptoms and preventive actions by PA system or audio clip every couple of hours and during floor meeting so the workers are encouraged to self-report when they are sick or experiencing symptoms of COVID-19.
- Provide trainings on appropriate use of PPE (i.e. how to dispose of gloves safely, how to take on and off masks, how to wash cloth masks)
- Posting awareness poster with several emergency instructions throughout the factory and distributing leaflet on COVID-19, including information related to health services. If possible factory should also use social media, SMS, apps for sharing awareness information with workers.
- Meeting with Participation Committee and Safety Committee (not gathering too many people at a time and ensuring meetings keep social distance), to encourage them proactively work to prevent COVID-19.
- Motivating all the employees to maintain personal hygiene in their homes also.

2.5 COVID-19 Management Guidance

 Forming Emergency Response Team to monitor all ongoing safety initiatives and to deal any emergency related to COVID-19. The Team should have both women and men represented, as well as both workers and managers.

 Factory should remove all spittoons and educate workers to use the washroom basin for spitting

2.6 Personal Protective Equipment (PPE)

The factory must ensure the following PPE is available to in-house medical staff:

- Disposable face masks
- Disposable goggles
- Gloves
- Medical clothes (including waterproof clothes)
- Plastic cover for the feet/shoes

Factory should provide the following PPE and support structures for staff

- Face masks for all employees, complemented by training on how to use, take off, and dispose of personal protective equipment properly
- Collecting all used PPE in a separate waste bin
- Monitoring by the taskforce, Safety committee, and welfare team of the respective floor with support from the medical team to check that all workers are using masks and all support staff are using mask and gloves properly
- Ensure adequate PPE for security guards

3. Identification and Isolation of potential and confirmed cases of COVID-19

- The factory should have a screening system for prompt identification system of COVID-19;
- Prepare a separate room for containment in case of workers are suspected or needed to consult with in-house medical staff(s) if available. Such quarantine areas needs to be isolated from the production floors, medical rooms and common areas.
- The employer must restrict the number of personnel entering isolation areas and protect workers in close contact with (i.e., within six feet of) a sick person or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices and PPE.
- In case any confirmed case is found, the factory should provide leave to the workers and proper counseling for self-quarantine. Below points should explain clearly and advise to follow during self-quarantine:
- Do not leave your home.

- Do not allow visitors.
- Only household members who are caring for the person suspected or confirmed of having COVID-19 should stay at home.
- Separate yourself from other people in the household. Use facemasks, if you have one, when in the same room with other people, to protect them.
- Stay in a well-ventilated room with a window that can be opened. If a dedicated toilet is not available, the isolated person should clean the toilet thoroughly after each use.
- Use separate towels, eating utensils, drinking glasses, bedding or any other household item commonly shared in the family setting.
- 3.1 The employer must inform the relevant authorities (e.g. Department of Factories & Boilers) regarding the confirmed cases.

4. Safe Transportation guideline

Transportation of goods and workers and the staffs is important for smooth operation of the factory, at the same time it represents a threat as they are potential transmitters of the virus. In order to avoid the spread of the virus via transport and supply means, the following precautious measures must be taken:

Transportation of goods

- Factory must ensure the disinfection of goods containers prior to arrival to the loading area.
- All incoming and outgoing vehicles are sterilized by using detergents and disinfection sprays.
- The driver is isolated directly in the decontamination zone. Ensure that drivers move individually to disinfection zones.
- Raise awareness and precautious measures among drivers on COVID-19.
- Inform the Medical Team or HR immediately if any health symptom appears on the driver in order to attend to necessary medical tests.
- Awareness brochures on COVID-19 virus are distributed to all drivers.
- All drivers must be given personal protection equipment which are kept in a special box.

Transportation of workers/staff

- Number of passengers in the vehicle should not exceed 50% of its capacity and should ensure zig-zag sitting arrangements.
- Vehicles must be sterilized every day, in particular doors and windows, handles and all points of contact from inside and outside prior to each trip and after. DO NOT disinfect when passenger are in the vehicle.

- Each passenger must follow hand-cleaning measures while using transport
- The driver must disinfect themselves prior to each trip
- Each vehicle should be provided with a hand-cleaning unit.
- Drivers must wear PPE.
- A special log must be used to document daily information about vehicle numbers and trips of all vehicle designated for workers' transport from home to factory and backward. The log must include the number of trips, times, and number of passengers of each trip.
- The Transportation coordinator/ COVID-19 task team should ensure follow-up of all safety procedures.

5. Common area norms at Manufacturing Locations

a. Entry & exit from plantpremises

- Safe distance of minimum 1 meter (3 feet) should be maintained between employees during entry.
- Body temperature for all employees should be checked and recorded with infrared thermometer before entering and exiting the facility. Establish periodic frequency of internal calibration of thermometer. The body temperature should not exceed 99.6 deg F.
- Hand wash / sanitization should be carried out by all employees before / during entry to theplant
- Biometric attendance or similar activities should be avoided. Widespread usage of other shared items (e.g. pens, registers) should also be avoided; may be used by dedicated admin / security staff for recordingpurposes.
- Establish frequency to take health self-declarations from employees and contractors on symptoms.

b. Canteens /cafeterias

- Access to canteens / cafeteria should be not having any door handles and alternate chairs sitting arrangement with sanitization after each use by housekeeping staff. Alternate shifts to ensure sitting of alternatechairs.
- Zones should be established within the common areas through physical segregation or by staggering timings (through extended cafeteria hours) to avoid mix up of employees from different workplaces.
- Distancing protocols should be established within the canteen, such as having only 2
 people per table instead of 4+ (to ensure minimum distance between employees)
- Disposable cutlery should be used (to the extent possible)
- · Multiple touch points to be avoided to the extent possible, by enforcing norms such as

- food to be served only by canteen personnel, single-touch point plate dispensing
- Hand wash to be made compulsory during both entry as well as during exit from cafeteria
- All areas should be sanitized and disinfected between every staggered meal timing, to the extent possible by avoiding physical transactions e.g. cash orcoupons.

c. Change rooms /Washrooms

- Limit number of employees entering the change rooms and washrooms at a time to maintain distancing protocol (minimum number to be accordingly defined on case-tocase basis for each change room)
- Access to change rooms and washrooms should be staggered (i.e. staggered timings, different entry-points as possible); i.e. employees from the same shift for given area should enter change-rooms together, to avoid contamination between different groups of employees.
- Employees from respective units / areas should avoid movement to other units unless it is part of work or responsibility. The same should be tracked by Section Heads.
- Areas that are frequently touched by employees should be cleaned regularly; e.g. phones, lockers, door handles, taps, bins, hangers in change rooms, cross over benches at change rooms etc.
- Frequency of common-area cleaning should be increased

d. Service areas – utilities, water system, HVAC floors, engineering & maintenance

- Dedicated personnel should be identified for each service area. Every maintenance personnel should use their own tools (not to be shared)
- Tools used for maintenance should be sanitized before and after use
- Entry of maintenance personnel in the manufacturing / QC area should be deferred (to the extent possible) for all non-essential maintenance activities; e.g. instrument calibration, preventive maintenance
- Maintenance personnel should enter manufacturing area only during critical breakdowns that cannot be resolved remotely. Before entering the Area owner or equipment owner need to be informed, so that there is minimum interaction between operations and maintenance personnel. If interactions need to occur only needed personnel with appropriate social distancing, PPEs and sanitization norms should be followed.
- Visitor entry such as vendors, technicians should be avoided to the extent possible

6. Movement: Essential and non-essential personnel mapping

 Minimum manning to be followed on the service floor and in lab (to the extent possible), and employees should be dedicated by unit operations or manufacturing areas / rooms. To be done by creating segregated employees

- Creation of employees maps to be done to ensure the way to minimize contact and walk maps in case the emergency response for Covid-19 positive case is identified.
- Matrix of essential employees should be created for every shift, preferably broken down to smaller.
- Based on this, a map of the typical set of people working in areas and their movements.
- If non-core personnel are required to be on site, it must be ensured that they do not come in physical contact with essential personnel and follow the protocol of social distancing, wear appropriate PPEs.

b. Behavior within the plant premises

- Employees should follow distancing norms even after changing into clean room garments, such as always remaining at least 1m (3 feet) apart, not filling documents together, avoiding sharing equipment ortools.
- Employees should be segregated to specific areas and should alignment with Section Heads if they need to move to otherareas.
- For movement in common areas entry/exit, canteens, change rooms the units should mutually agree on staggeredtimings.
- Hands should be disinfected after touching any external object e.g. equipment, doors, documents
- Air-lock mechanism should be used while transferring samples from manufacturing area to QC lab. Samples should be preferably packed into an additional cover / polybag which should be removed in the airlock
- Documentation should not be handled with bare hands; QA personnel should also wear gloves while reviewing thedocuments
- Use of telephone receivers should be avoided; speaker phone should be used to the extent possible

c. Shift handover

- Handovers should happen remotely and not in-person; i.e. employees working in one shift should exit the facility before employees from next shift enter the change room
- Key messages during handover should be written using personal / shift-specific pens on defined sheets of paper and stored at a defined location, such as on white boards.
- In case it is essential for an employee to stay back (due to critical handovers, critical manufacturing step) a dedicated employee should be identified from the shift and should maintain adequate distancing procedures. This should also be adequately recorded in the tracking mechanism set up by local HR.

6.1 Adaptation for team members &contractors

- Essential team members and contractors should be identified in advance and all facilities should ensure their safety should be extended
- Same safety protocols implemented for contractors and union employees as permanent employees
- Workers and contractors should be dedicated to the same set of employees coming to the plant in a particular shift.
- For times when an contractor is assigned for non-routine activity a record should be maintained for every worker contractor coming in contact with employee other than the defined matrix.

7. On-site material-movement norms

Overall material-movement across receipt, testing & release, dispensing & issuance, FG movement, should be carried out in line with existing site procedures. In addition, there are a few select safety practices that may be adopted, mentioned below:

7.1 Receipt of raw material & packing material

- Once the materials are received at the receipt bay, surface sanitization should be performed in addition to de dusting without pneumatic blowers (if not a part of existing procedure)
- All containers should wipe out with 70 %IPA.
- Operator and supervisor should wear appropriate safety PPE's like safety goggle, Hand gloves and nose mask, etc.
- During operation if any health-related issues, Operator should communicate immediately to immediate supervisor and department head.
- Supervisor / Department head shall direct operator to OHC if available immediately for further medical attention.
- Dedicated personnel within the Stores team should handle the material (employee or contractor)
- A record should be maintained for personnel receiving the material.

7.2 Testing and release of material

- It should be ensured that sampling of the material is done a dedicated person/s no more than 2 by following appropriate PPEs and sanitization norms.
- Sampling should be done in a designated place with appropriate cleaning protocols in place preferably under sampling booth
- External surface sanitization should be done for both material and tools before and after sampling process

 Record should be maintained for the personnel conducting the sampling and also involved in movement of material required for sampling

7.3 Dispensing & issuance of raw material & packing material

- Dispensing should be performed by dedicated personnel within the team
- The dispensed material should be dropped off at material airlock of manufacturing / packing area
- Surface sanitization should be done before accepting the material into the manufacturing / packing area

7.4 Equipment used to transfer to material

 All equipment (forklift, hand pallet, Stacker etc.) should be cleaned and sanitized before and after every use using the existing plant procedures.

8. Update policy and communicate with all personal:

- Situation should be monitored on official channels at least daily and government mechanism should be put in place for quick reaction to emerging situation on plant operations.
- Plan should be put in place to adapt current manufacturing strategy to changing pandemic scenario.
- Organize the information daily into a "Situation Status Report" and relook at the policy and norms for employee safety as well as operations continuity.
- Communicate the change in policy with all employees through an emergency notification system to keep employees on top of latest news (e.g. through text messages or emails)