

National Associations Strategic Partnership

NASP Guidelines on driver trainers safely returning to work 2nd July 2020

NASP appreciates the huge impact on the business of driver and rider trainers due to Coronavirus (COVID 19). Primarily we encourage you to follow all Government and Health and Safety advice. As we start to go back to work the priority must be the health of your clients, yourself and the population at large.

At this time the population still does not have any proven immunity from COVID 19 and, as yet, we have no vaccine or nationwide tracing app for the virus, so it still has the potential to spread extensively. Trainers will need to remain ALERT and make their own risk assessments concerning the provision a safe system of work. The health and wellbeing of clients, ourselves and those closest to us must be our primary consideration as we return to work.

In evaluating your return to training on-road, you should also be alert to the risks to your vehicle insurance, professional indemnity, and public liability insurance of making modifications to vehicles that are not approved as safe by manufacturers and insurers. Following Government and HSE Guidance provides a safe environment for clients, and failure to do this may breach HSE Regulations.

Each of us will need to consider:

- If we ourselves, or our client, have any symptoms
- If we ourselves, or our client, fall into higher risk groups
- If as an ADI we have a relative or partner we are living with who is also moderate or high risk

The main symptoms of COVID 19 described by the government are (but not exclusively):

- a high temperature this means you feel hot to touch on your chest or back (you do not need to measure your temperature)
- a new, continuous cough this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual)
- a loss of taste or smell

COVID-19 can make anyone seriously ill. But for some people, the risk is higher. There are 2 levels of higher risk as described on the gov.uk website:

- high risk (clinically extremely vulnerable)
- moderate risk (clinically vulnerable)

People at high risk from coronavirus include people who:

- have had an organ transplant
- are having chemotherapy or antibody treatment for cancer, including immunotherapy
- are having an intense course of radiotherapy (radical radiotherapy) for lung cancer
- are having targeted cancer treatments that can affect the immune system (such as protein kinase inhibitors or PARP inhibitors)
- have blood or bone marrow cancer (such as leukemia, lymphoma or myeloma)
- have had a bone marrow or stem cell transplant in the past 6 months, or are still taking immunosuppressant medicine
- have been told by a doctor they you have a severe lung condition (such as cystic fibrosis, severe asthma or severe COPD)
- have a condition that means they have a very high risk of getting infections (such as SCID or sickle cell)
- are taking medicine that makes them much more likely to get infections (such as high doses of steroids)
- were born with a serious heart condition and are pregnant

People who are shielding remain vulnerable and should continue to take precautions but can now leave their home if they wish, as long as they are able to maintain strict social distancing.

- If you're classed as clinically extremely vulnerable from coronavirus
- If you're clinically extremely vulnerable, you should have received a letter telling you that you're in this group or have been told by your GP. DVSA recommends that you take your driving test after 1 August 2020, when shielding will be paused.

People at moderate risk from coronavirus include people who:

- are 70 or older
- are pregnant
- have a lung condition that's not severe (such as asthma, COPD, emphysema or bronchitis)
- have heart disease (such as heart failure)
- have diabetes
- have chronic kidney disease
- have liver disease (such as hepatitis)
- have a condition affecting the brain or nerves (such as Parkinson's disease, motor neurone disease, multiple sclerosis, or cerebral palsy)
- have a condition that means they have a high risk of getting infections
- are taking medicine that can affect the immune system (such as low doses of steroids)

• are very obese (a BMI of 40 or above)

If you're at moderate risk from coronavirus, it's very important you follow current Government advice, which states you should take particular care to minimise contact with others outside your household.

If you're pregnant and worried about coronavirus, there is advice on the gov.uk website.

Remember that these rules apply to your customers too.

Government advice in England for employers is for those who cannot work from home to follow social distancing guidelines which in England suggest keeping 1 metre + apart (may differ in other countries) from colleagues or customers. This is still impossible for driver trainers in car. Even when that is not possible it doesn't mean you can't necessarily work.

Recommencing Work:

When and if you make the choice to return to work it will be an individual decision for your business, but we advise that you make sure that you follow these guidelines:

Before collecting the client, we recommend:

- Consider whether you or they have had any symptoms of the virus within the last 7 days or have been in contact with someone who has within the last 14 days.
- Before you leave to collect the client for a lesson call or text them and check if they have had any symptoms of the virus within the last 7 days
- If they know anyone or have been in contact with anyone that is showing symptoms or has been doing so within the last 14 days.
- Remind them to wash their hands for at least 20 seconds, in line with Government guidance, immediately before leaving the house for their lesson. If they want to wear disposable gloves, to put them on just before getting into the car. Remind them that they should not touch their face.
- Make sure you ask your client to wear suitable clothing providing as much covering as is reasonable. Short sleeves are now acceptable.
- Once you arrive to collect them you should again assess whether they are well enough to start the lesson. Do not let them get into the car straight away, try to have a conversation with them at least 2 metres away and see if you notice any symptoms. Arrange to meet by the vehicle not at their front door.
- You need to be 100% happy with their state and if you are not don't start the lesson and explain you need to cancel until they have recovered fully. Ideally do this before every lesson you have even if you only saw the pupil the day before
- Make sure then that they have washed their hands or have hand sanitiser ready for them making sure they sanitise their hands before getting into the car.
- Explain that you have also just cleaned your hands with hand sanitiser, or soap and water where possible and that both of you should avoid touching your face and hands

- Explain you will not shake their hand share visual aids, pens etc. with them and will be minimising contact with them for safety
- Explain that between lessons you have cleaned down door handles inside and out, windows and mirror controls, seat adjusters and head restraints, seatbelt and its connection, gear lever, steering wheel, indicator and wiper stalks, car keys and training resources
- Explain that the windows will be down as much as possible during the lesson to allow for ventilation, and tell them to wrap up warm as it might be cooler in the car than usual
- Avoid using the air conditioning if possible, however if it is used don't set it to recirculate
- Explain at this time that the clients parents, guardians or friends, will not be able to sit in on the lesson or test
- Any new clients will need their licence checked electronically at https://www.gov.uk/check-driving-information You need: the last 8 characters of their driving licence and the check code from the client, ask them to hold the licence up so you can check it. Don't touch or take the licence from them. The code will be valid for 21 days and you can only use the code once.
- If you are considering making any additions in the vehicle, i.e. plastic screening or dividers, please check any construction and use rules, as they may affect the airbag deployment and could mean you can't safely reach all the controls when required and they will need to be taken out for the driving test. Also check with your car insurance before making any construction and use adaptations.

Personal Protective Equipment (PPE):

- It is essential you have hand sanitiser and wash your hands as frequently as you can.
- Antibacterial wipes or spray (check they also say virus) should be used to clean down the car between lessons. Household disinfectant can also be used.
- Public Health England (PHE) household guidance on the disposal of waste that could be infected with COVID-19 states that you must securely store the PPE waste in disposal rubbish bags. You must place these bags in another bag. You must tie this bag securely and keep it separate from other waste. This waste must be set aside for at least 72 hours before being put in the usual external household bin for non-recyclable waste.

You may also want to consider the following:

- Disposable gloves could be worn by yourself and the client, but you will still need to wash your hands and clean down surfaces and controls. Some people have a latex allergy so check with your clients. You will need to change them after each lesson
- We would not recommend the use of face visors, however, If a pupil is insistent on wearing one, then a mask or face covering must also be used as wearing a visor alone will provide little protection. Check with your insurance providers first before using a visor.
- Have a supply of both gloves and masks to offer your client before they enter the vehicle

- If you do use a mask, make sure you use a new one frequently and dispose of the old one safely and responsibly. Cloth ones need to be washed at least daily and at 60 degrees and above to be effective. Gloves need to be changed frequently.
- Make sure you ask your client to wear suitable clothing providing as much covering as is reasonable, however, short sleeves are now acceptable.
- Wash your clothing as soon as you have finished work for the day
- Avoid beaded seat covers that are difficult to clean between lessons
- It is essential that the PPE equipment you choose does not impede yours, or the client's ability to control the vehicle or communicate with you. For that reason we do not recommend plastic face visors or plastic screen dividers between yourself and the client. They could be dangerous if they mist up or an airbag is deployed and they may be regarded as an adaptation to the vehicle.
- The instructor must wash their hands as soon as they get home, they should wash their clothes at 60 degrees and shower or bath at the end of the day.

During the lesson consider the following:

- Visual aids and any training resources should be held up and not passed between the two of you to hold and touch
- Writing should be done by the ADI don't share a pen or other devices where possible. If you do then clean with anti-bac wipes straight afterwards
- Try to avoid directly facing each other when discussing scenarios, it is safer to face forwards in the vehicle because we cannot maintain being 1 metre + apart in England, other countries may differ
- Have a discussion outside of the car where safe and legal to do so
- If you give a demonstration drive you will need to wipe down the controls before and after the drive
- If the instructor has to touch the controls during the lesson the car must be pulled up at the earliest convenience and the controls must be wiped down. If the instructor and client touched hands as a result they must both sanitise their hands.
- Consider wherever possible giving any briefing notes digitally
- Consider wherever possible reducing the handling of cash and use electronic payments and receipts

After the lesson:

• After you have finished the lesson you will need to repeat some of the same processes that you did at the start of the lesson. If you then drive to pick up your next client, you will need to repeat the process again, in short, each time that someone has been in the driving seat. Make extra time between lessons to allow for this

- No hand shaking, clean your hands but do not go into the clients house to do this. Use hand sanitiser if you do not have access to soap and water
- Remind the client to wash their hands as soon as they get back into their house
- Wipe the car down ready for the next lesson or your journey home
- Call your next pupil and assess their state to avoid a wasted journey
- Consider wherever possible to use your vehicle solely for work purposes and minimise allowing family in it if at all possible

Taking a client to test:

- Please arrive at the test centre no more than 5 minutes before the test time, this should allow you time to wipe down the examiners side of the vehicle, including seat adjusters and head restraint, seatbelt and its connection, the dashboard area and passenger door contact points
- Remember test times may be different to before as DVSA try to maximise social distancing and avoiding too many people gathering at once.
- It is recommended that you leave your ADI certificate in the window as you can be contacted sooner by your ADI number if an examiner tested positive for Covid19.
- The meet and greet by the examiner will be conducted in the car park or usual meeting place where tests usually begin where there is no car park
- Test & Trace. The Candidate participation in the NHS Test & Trace initiative is a requirement for taking a practical test. The examiner will ask the candidate; "Can you confirm that you are taking part in the Government test and trace or similar national initiative and that you are happy for your details to be passed to the relevant tracing authority if needed for Covid 19 tracing purposes." Should the candidate not be taking part in the test and trace initiative the test cannot go ahead.

If a driving test candidate or driving examiner develops symptoms in the days after a test, the NHS Test and Trace service will use data DVSA collects from the candidate to contact them.

We've updated our privacy notice published on <u>GOV.UK</u> to explain how we manage personal data. See section 4.1 of the following document: Book and manage your driving test: privacy notice.

- The examiner may choose to fit a disposable seat cover and must be satisfied the car has been recently cleaned. The examiner will use an anti-viral wipe to clean the passenger door and touch points.
- Candidates must bring and wear a face covering for the duration of the test, the Examiners can provide one to the candidate if needed. This is a mandatory requirement unless the DVSA is informed at the time of test booking a suitable reason for not wearing one such as a physical or mental illness, impairment or disability that means candidates cannot put one on or remove one.
- Examiners will wear a face covering.

- Not all test centres will be open straight away and this will vary from site to site. The DVSA need to ensure centres are safe before reopening after being closed for such a long time.
- Waiting room facilities will not be available for candidates. Candidates will be asked to wait outside so ensure you plan for this with suitable clothing.
- If the centre has toilet facilities for candidates, they will remain closed unless someone has a disability, a medical condition, or is pregnant.
- Explain to the client how the examiner will behave before arrival at the test centre.
- You will not be allowed to accompany the test.
- You may not be allowed to attend at the end of test debrief.
- It is a requirement for candidates taking a practical test to participate in the NHS Test and Trace initiative. The examiner will ask candidates to confirm they are happy to take part. If the candidate refuses the test will not go ahead. This is to help protect candidates and examiners should anyone develop symptoms or test positive for Covid 19.
- If a candidate develops a cough, or becomes unwell during the test, the test will be stopped.
- If a candidate develops symptoms within the 3 days prior to a test, they can rebook to another date without losing their fee.
- If a candidate commits a serious or dangerous fault (or makes 16 driving faults) that would result in a fail, they will be directed back to the Driving Test Centre. Test conditions continue until they return to the centre, where the test will be ended and a debrief offered.

Terms and Conditions (T&C's) during COVID 19:

Your usual T&Cs may need to be revised during this time. An example would be for your late cancellation policy due to COVID-19. This could relate to the following situations:

- If your client or anyone in their household becomes unwell and has symptoms
- If your client believes they may have been in contact with someone showing symptoms
- If you become unwell and are showing symptoms or if anyone in your household is showing symptoms
- If you believe you may have been in contact with someone showing symptoms

Please keep checking the NASP website www.n-a-s-p.co.uk, individual NASP member association websites, member emails and social media for updated information. This advice is for everyone when your government say it's safe to work.

Please remember that ADINJC, DIA and MSA are the only Tier 1 consultative stakeholder of DVSA within the ADI industry and as such receive information and communications direct from the regulator to disseminate to members. It is wise to check the source and validity of any other information you see, particularly on social media, if it does not come from a professional body within the sector.