

CONSULTATION: Short Consultation - Assessment of a Reduction in Manufacturing Sector Physical Distancing Requirements

SUBMISSION BY THE SCOTTISH CHAMBERS OF COMMERCE

Introduction:

The Scottish Chambers of Commerce (SCC) welcomes the opportunity to respond to this consultation from the Scottish Government in relation to an Assessment of a Reduction in Manufacturing Sector Physical Distancing Requirements.

We share a summary on these issues below in Section 1 before suggesting necessary amendments/changes to physical distancing requirements in Section 2 which would help to produce a more fairer and productive operating environment for the businesses in this sector in Scotland.

Summary of Position:

- When minimum social distancing requirements were announced for the hospitality, retail, and public transport sectors, we received a considerable amount of feedback from members relating to this change, expressing disappointment and confusion as to why this reduction in minimum distance would be applied to these specific sectors, but not to the manufacturing sector.
- The manufacturing sector generally enjoys high space ratios of square metre per employee, and due to the nature of its standard work has embedded a culture of highly regulated, risk assessment led work practices. During Covid-19, the nature of sector operations have been managed to ensure a consistent, closed and minimum group of workers required to attend the workplace, ensuring minimal risk of wider transmission backed by robust contact tracing arrangements due to these already being in place to manage visitor and supplier contacts.
- Alignment of the guidance with other sectors will help protect the future of the manufacturing sector and jobs, and can be taken on the basis that if the risks are deemed acceptable for sectors with minimal controls they should easily be acceptable for sectors where those controls are extensive.

Response:

Evidencing the need for a reduction in physical distancing - additional information setting out the impact on capacity, productivity, investment and jobs currently caused by the requirement to operate at 2m.

- At this time, Scottish manufacturing businesses operate at a disadvantage to those in England. In England, manufacturing businesses can adopt a 1m rule with safety provisions. That is not the case in Scotland.
- In addition, jobs could be at risk as operating at 2m will continue to have a negative effect on productivity. As the UK furlough scheme continues to taper off and comes to an end next month, this could have severe consequences for employment and the full recovery of the sector.
- The suggestion to apply a 1m exemption only to those firms who can demonstrate significant capacity or productivity constraints that calls into question forward investment or maintenance of employment is one that does raise concern. It will

require a high level of resource to validate and enforce due to the subjective nature of the statement. In our view, manufacturing settings are already applying strict health and safety standards and all manufacturing sites should be able to operate at a reduced distance of 1m with additional control measures and extensive risk assessments, should they choose to do so.

- The capacity to deliver training with a 2m physical distancing is proving difficult for many which is impacting the sector's ability to train new apprentices. This will have a long-term impact on new apprenticeships and will disproportionately impact younger people.

Managing the increased risk of spread of Covid at reduced (1m) physical distancing - views on the proposals outlined in the first four bullet points and the provision of additional information as noted.

- These proposals are reasonable and businesses will be stringent in their implementation to ensure the safety of their workforce.

Ensuring the safety of vulnerable staff - views on the measures outlined

- We absolutely agree with the position that any guidance must take consideration of and protect those most at risk at this time: BAME employees, those with pre-existing health conditions, any employees that have come out of shielding.
- The measures proposed in this section are sound and would be necessary to protect staff who may face more risk working than others.
- A collaborative approach between the employer and employee should be taken to ensure necessary adjustments and provisions are made to ensure safety.

Proposed mitigating measures - other mitigation measures that could contribute to risk reduction

- All these proposals are reasonable and in the best interests of preserving the safety of the worker.

Conclusion:

Other business organisations share our concerns as outlined above, we hope that our constructive feedback will support the necessary amendments and changes that are required to make the physical distancing requirements more fair and supporting of the sector as it looks to contribute to the economic recovery.

About SCC:

The Scottish Chambers of Commerce Network sits at the heart of local business communities, representing over 12,000 businesses in Scotland. With 30 local Chambers rooted in communities across Scotland, the Chamber Network provides practical advice and support to Scottish companies through unrivalled expert leadership, business-to-business connections, mentoring/coaching, business support services and international trade support.