

Infection Prevention & Control Management Plan

HOW THE LIGHT GETS IN

Hay on Wye

2-5 June 2022

Version issue number	Date	Reason
1	9 March 2022	Initial for review

SECTION 1 - INTRODUCTION	3
1.1 AIMS OF THIS PLAN	3
1.2 BACKGROUND TO COVID-19 & CONSIDERATION OF OTHER INFECTIOUS AGENTS	3
1.3 MEANS OF TRANSMISSION	3
SECTION 2 - RISK MANAGEMENT	3
2.1 CURRENT MEANS OF INFECTION PREVENTION CONTROL (GUIDANCE)	3
2.2 MOVE AWAY FROM CURRENT INFECTION PREVENTION CONTROL GUIDANCE	4
2.3 TRANSMISSION AND RISK CHARACTERISTICS RELATING TO THE EVENT	4
2.4 MEASURES THE EVENT ORGANISER IS CURRENTLY CONSIDERING	4
SECTION 3 - DECISION MAKING AND ONGOING REVIEW	5
3.1 DECISION MATRIX	5
3.2 HM GOVERNMENT COVID ALERT LEVELS	5
3.3 RISK FACTORS TO THE EVENT	6
3.4 COOPERATION AND COORDINATION WITH LOCAL AUTHORITIES	6
3.5 REGULATORY AND LEGAL FRAMEWORK	6
SECTION 4. PLANNED CONTROLS	7

Section 1 - Introduction

1.1 Aims of this Plan

It is recognised by the event management and safety teams that planning for How the Light Gets In 2022 takes place during a global pandemic. It is the aim of this plan to:

- Document the organisers strategy and planning assumptions relating to COVID-19 and other infectious illnesses.
- Provide an overview of the tactical options for mitigating any risk which remains from this disease.
- Be a basis for discussion and joint working with the Local Authority and NHS

This plan has been prepared by Calvin Hanks, MSc, MSc, PgC, CMIOOSH, FRSPH, FIIRSM, MCIEH whose qualifications include:

- MSc in Environmental Health
- PgC in Infection Control

1.2 Background to COVID-19 & consideration of other infectious agents

References to COVID-19 (the disease associated with the SARS-CoV-2 Novel Coronavirus) are used throughout to refer to SARS-CoV-2 and the terms for the purpose of this risk assessment are used interchangeably. This risk assessment is based on data and guidance available from the World Health Organisation, Public Health England, Health and Safety Executive and HM Government guidance.

As an active disease, COVID-19 is constantly evolving and variants of concern [VoC's] which have the potential to increase infection rates and alter the risk management landscape have and will continue to emerge. Throughout 2020 and 2021 what has become apparent is that the disease can take unpredictable paths and the law, as well as government advice and strategy can change very rapidly as a result.

Alongside this, other infectious agents can present a concern, especially given the potential for weakened immunity due to lack of exposure over the last 2 years during lock downs and restricted access.

1.3 Means of Transmission

The primary means of transmission of COVID-19 is thought to occur by respiratory droplets generated by coughing, sneezing and talking. This is from various sizes of droplet.

The distinction of 'droplets vs aerosols' (<>5µm) is not as clear as may be suggested, in-fact droplets would need to be between 60-100µm to fall to the ground within 2 metres ¹. Droplets of 50µm have been found to linger in the air for significant amounts of time. It is therefore important to recognise that whilst all social contact poses a risk of COVID-19 transmission, that risk is significantly higher in poorly ventilated indoor areas.

A secondary means of transmission is thought to be surface contact (i.e. Surface > Hand > Face). Survival on environmental surfaces is dependent on the surface type. An experimental study using a SARS-CoV-2 strain reported viability on plastic for up to 72 hours, 24 hours on cardboard, 48-72 hours on stainless steel, however more recent studies have been unable to cultivate viable virus samples from surfaces. ²

In a similar way, other infectious agents are thought to be transferred by similar means and therefore controls for COVID-19 will assist in preventing spread of other infectious agents.

Section 2 - Risk Management

2.1 Current Means of Infection Prevention Control (Guidance)

The current guidance ³ in relation to minimising the risk from COVID-19 in the workplace stresses non-pharmaceutical interventions [NPI's], in particular:

¹ [www.thelancet.com/journals/lanres/article/PIIS2213-2600\(20\)30514-2/fulltext](http://www.thelancet.com/journals/lanres/article/PIIS2213-2600(20)30514-2/fulltext)

² [www.thelancet.com/journals/laninf/article/PIIS1473-3099\(20\)30678-2/fulltext](http://www.thelancet.com/journals/laninf/article/PIIS1473-3099(20)30678-2/fulltext)

³ www.gov.uk/guidance/working-safely-during-coronavirus-covid-19

Hands - Wash hands regularly or use sanitiser
Face - Wear a Face Covering Indoors or where distancing cannot be maintained
Space - Maintain 2m distancing, or 1m where other controls are in use.
(Replace) - Air in buildings via ventilation (added recently)

Although these controls are no longer legally implemented, the HASAWA 1974 requires us to ensure no one is placed at harm, employees and non employees, and therefore we have a duty to protect those entering the site.

2.2 Move Away from Current Infection Prevention Control Guidance

The current guidance and framework is therefore very different to what is expected when this event takes place. It is expected that the 'COVID Alert Level' will reduce even further as the country re-opens. It is also expected that less emphasis is placed on NPI's, as more of the population is vaccinated and testing and therapeutics improve.

We also know from other respiratory infections and from the COVID-19 pandemic in the summer of 2020 & 2021 that the summer months lessen the spread of this and similar viruses due to a combination of social and environmental factors.

All of this combined means that it is not appropriate to plan for a 'socially distant' event or one based around the strict enforcement of NPI's. We remain aware that the direction of this pandemic has changed rapidly multiple times, causing equally unpredictable changes in government strategy and regulation. We will also consider the longer-term impact of COVID-19, including the need to maintain and encourage voluntary infection control measures. The emphasis will be on ventilation and hygiene, with facilities for space for those who require. These controls as reflected above will support not only reducing spread of COVID-19 but other infectious agents.

2.3 Transmission and Risk Characteristics relating to the Event

The event takes place during the summer months. The number of respiratory infections declines during these months. The event takes place primarily outdoors and in well ventilated structures. The event is not focused on music, dancing, shouting, singing etc. It is a family-friendly cultural festival focused on talking, debating and similar. Levels of intoxication are likely to be low.

The event offers plentiful space for distancing and additionally is mainly outdoors, which presents less risk than indoor events.

The event will have its own medical team able to deal with minor ailments and transport more serious cases to hospital. They will therefore minimise the risk of using any NHS resources during a time where they may be under strain.

2.4 Measures the Event Organiser is Currently Considering

The event organiser is currently planning the following methods to reduce the risk of COVID-19 and other infectious agents transmission and assist in maintaining public health at the event:

Hand Washing / Sanitisation Facilities - All bathrooms will be regularly stocked with soap and/or hand sanitiser and both hand washing and sanitation facilities will be available for customer and staff use. Additional hand sanitiser stations may be implemented at food vendors and bars. Small bottles of hand sanitiser (200ml max) will be permitted into the arena, even if liquids are not allowed.

Camp sites and the main event arena will have flush toilets and running water for handwashing.

Face Coverings - Will be permitted to be worn at people's own discretion. The event has a very low risk profile and no history of crime that would make face coverings inappropriate, and so there is no reason they should not be allowed.

Public Messaging - Pre-event messaging will ask people to remember good hand hygiene, cough etiquette etc. Dependent on risk at the time of the event, posters can be displayed also reminding people of whatever guidance is in place at the time.

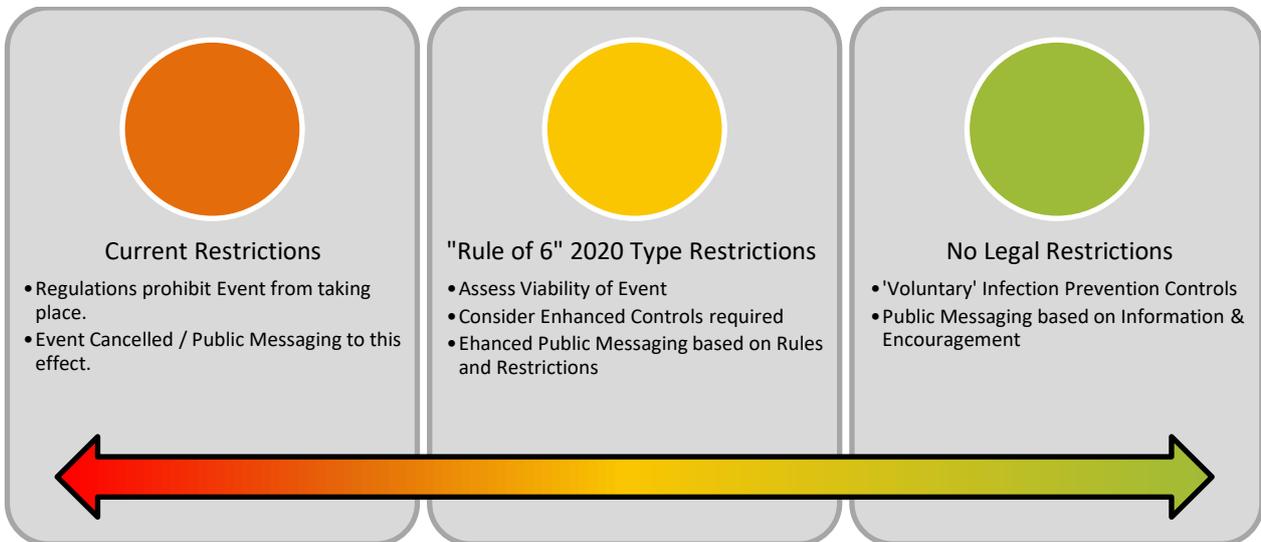
Medical Team Awareness - The event medical team will remain aware of the risk of COVID-19 and alert to any symptoms. Appropriate PPE will be worn when dealing with patients depending on risk factors. An isolation facility (will be available should anyone present with symptoms of COVID-19

Section 3 - Decision Making and Ongoing Review

3.1 Decision Matrix

The above measures can be summarised into the following decision matrix. This broadly sits with levels 4, 3 and 2 of the Government 'Covid Alert Level', however may not function identically and will depend on the changing guidance and legal restrictions. Although current alert levels are low with no restrictions, we remain alert to the potential for reoccurrence and changing status.

It is currently anticipated for the reasons already given that the event will fall into the green zone for risk management, and this complies with the government's own roadmap.



3.2 HM Government COVID Alert Levels

The HM Government COVID alert levels are presented for comparison with our decision matrix.

COVID Alert Levels		
Level	Description	Action
5	As level 4 and there is a material risk of healthcare services being overwhelmed	Social distancing measures increase from today's level
4	A COVID-19 epidemic is in general circulation; transmission is high or rising exponentially	Current social distancing measures and restrictions
3	A COVID-19 epidemic is in general circulation	Gradual relaxing of restrictions and social distancing measures
2	COVID-19 is present in the UK, but the number of cases and transmission is low	No or minimal social distancing measures; enhanced testing, tracing, monitoring and screening
1	COVID-19 is not known to be present in the UK	Routine international monitoring

STAY ALERT > CONTROL THE VIRUS > SAVE LIVES

3.3 Risk factors to the Event

The following risk factors will be monitored and considered during the decision-making process. These factors are the most likely 'warning signs' that a risk could be presented to the event and ongoing re-evaluation will be required.

1) Variants of Concern [VoC's]

Variants of Concern have significant impact on vaccine efficiency
Variants of Concern become significantly more transmissible or deadly

2) Vaccine Rollout

Vaccine rollout is slower than anticipated
Major issues with vaccine supply chain
Vaccine uptake is much lower than expected, thus lessening immunity

3) General Case Numbers

Rising Case Numbers Generally
Rising R Value Generally

4) Local Case Numbers

Rising Case Numbers Locally
Rising R Value Locally

5) Other Significant Unforeseen Impacts

Pandemic Flu or other illness at same time as COVID
War or other national crisis at same time as COVID
Public Disorder regionally or locally at same time as COVID
Collapse of NHS due to backlogs from COVID
Rise in other infectious agents

Any combination of these risk factors should be cause of re-evaluation of the Management Strategy.

3.4 Cooperation and Coordination with Local Authorities

This management strategy should be shared with the local authority, in particular the director of Public Health as well as the Local NHS Trust via the Safety Advisory Group Process. A copy of this management plan will be included as an appendix to the Event Safety Management Plan.

It is expected that the SAG and Local Authority Director of Public Health will provide guidance and advice, as well as advanced warning of any significant changes in the pandemic likely to pose a risk to the public at this event. This will inform the decision-making process as documented above.

The aim of the event organisers is to work collaboratively with the Local Authority and DPH to ensure the risks are adequately mitigated at the event.

3.5 Regulatory and Legal Framework

Local Authority Directors of public health have been granted significant powers under the Public Health (Control of Disease Act) 1984 and the Coronavirus Regulations made under this act. The regulations are changed very regularly and it is not always clear which regulations are in force at any given time. It is therefore expected that should the authority feel the need to issue any formal direction, condition or other legal order, that they will specify which regulations they are using to do so (and that these regulations will be currently in force).

It is also of note that COVID-19 as a public health issue is not a 'public safety' issue by virtue of the licensing act 2003. As per the guidance issued under s182 Licensing Act 2003 by the Secretary of State (paragraph 2.8):

"Licence holders have a responsibility to ensure the safety of those using their premises, as a part of their duties under the 2003 Act. This concerns the safety of people using the relevant premises rather than public health which is addressed in other legislation. Physical safety includes the prevention of accidents and injuries and other immediate harms that can result from alcohol consumption such as unconsciousness or alcohol poisoning. Conditions relating to public safety may also promote the crime and disorder objective as noted above. There will of course be occasions when a public safety condition could incidentally benefit a person's health more generally, but it should not be the purpose of the condition as this would

be outside the licensing authority's powers (be ultra vires) under the 2003 Act. Conditions should not be imposed on a premises licence or club premises certificate which relate to cleanliness or hygiene."

Changing regulations and guidance are likely to remain the key challenge with regards to events and therefore information, news and industry knowledge should be regularly monitored and an open dialogue maintained with local authorities and DCMS (if applicable).

Section 4. Planned Controls

In light of changes in legislation and government guidance, the following controls will be required for entry to the event:

We have updated our festival policy in line with the government decision not to implement the covid passport policy for large events. We have reviewed all our safety measures and all of our plans are now in place to ensure that venues are well ventilated and venues are spaced to enable those who wish to maintain social distancing can do so. There will be hand sanitiser and/or hand washing facilities available at various points on the festival site.

We are not asking visitors to show proof of their vaccine status but we will request that they don't enter the site if any of the below applies to them;

1. have tested positive for COVID-19 in the last 10 days
2. believe you may be infected with COVID-19, whether you have symptoms or not
3. have experienced symptoms in the last 10 days
4. have been in close proximity to anyone who has experienced symptoms or tested positive in the last 10 days

We are asking staff and traders to show:

- a. Proof of a negative Lateral Flow test within 24 hours of attending the festival. Or,
- b. Proof of natural immunity, based on a positive PCR test within 180 days of the festival (but no later than 14 days before the festival).

NHS Covid Passes generated from a negative Lateral Flow Test expire after 48 hours. If you are planning to attend on Saturday and Sunday best therefore to take the test on Friday afternoon/evening. Your test result can take up to 2 hours to appear in the Covid App, so it is worth logging your test the night before you arrive at the event.

Personal Data

No personal data relating to Covid Status will be held or retained.

Please note that this only applies to festival attendees aged 18 and over; those under the age of 18 will be asked for verbal confirmation (by them or by a parent or guardian on their behalf) that they have not received a positive test for COVID-19 within the last 14 days and are not displaying symptoms of COVID-19.