

## **BASC COVID guidance for game shoots in England**

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### **Introduction**

This guidance document has been produced to assist those managing game shoots to think about and manage the risk posed by COVID-19 and compliance with government restrictions on shoot days.

It provides a broad overview of the aspects of a shoot day which may present risk of transmission of COVID-19, and therefore which gamekeepers, shoot captains and others managing shoot days may need to consider.

This document is not an exhaustive list of actions, given that guidance from government on managing the risk of COVID-19 is frequently updated and that all shoots operate differently.

Gathering limits imposed across England from 14 September restrict social gatherings to no more than six people both indoors and outdoors. Shooting is exempt from this restriction as a 'licensed outdoor physical activity'. However, the exemption requires, by law, that the organiser produce a risk assessment and implements all reasonable measures to limit the transmission risk of coronavirus.

The Government has outlined five practical actions for business to take to manage the risk of COVID-19 in the workplace. These actions can readily be applied to shoots to help reduce the risk posed by COVID-19. Currently, this includes:

1. Carry out a COVID-19 risk assessment
2. Develop cleaning, hand washing and hygiene procedures
3. Help people work from home
4. Maintain 2m social distancing
5. Where people cannot be 2m apart, manage the transmission risk

Assessing the risk of COVID-19 on shoots is important to ensure the safety of all participants. How risk is managed must take into account the regulation and government guidance in force on the day of the shoot.

### **How to use this guide**

This guidance document is intended to support those managing shoots to think about the risk posed by COVID-19 on a shoot. It is intended to help individuals when preparing risk assessments for COVID-19 by supporting identification of areas of risk and mitigation measures which may be required. It cannot be exhaustive, and each shoot will need to be considered in the context of its own operations.

The document includes considerations around COVID-19 prior to a shoot day, general aspects of COVID-19 transmission risk which will need to be managed on a shoot day, as well as specific areas of risk and how these might be managed.

## **Considerations prior to the shoot day**

### Risk Assessment

A risk assessment in accordance with regulation 3 of the Management of Health and Safety at Work Regulations 1999 is legally required for all shoots operating under the exemption that allows more than six people to gather. The shoot organiser is legally responsible for ensuring a risk assessment is in place and measures to limit the risk of transmission of coronavirus are implemented.

Each individual shoot should undertake its own risk assessment and scenario planning for shoot days. There will likely be differences between different shoots, but all risk assessments should include consideration of the key aspects in this framework alongside its usual assessment of health and safety risks.

Specific guidance on completing a risk assessment for your shoot can be found here <https://basc.org.uk/health-and-safety/>

A risk assessment template from the Health and Safety Executive can be found <https://www.hse.gov.uk/simple-health-safety/risk/risk-assessment-template-and-examples.htm>

You can use this guidance to help identify potential COVID-19 risk factors and potential mitigation measures to help reduce the risk, so that you are operating in a COVID safe way **As with any risk assessment, if you are not confident that the risk can be reduced to an acceptable level, then the activity should not go ahead.**

When applying mitigation measures you must refer to and take account of government regulation and guidance in force at the time the shoot is to take place. The latest Coronavirus regulation can be found at [www.legislation.gov.uk](http://www.legislation.gov.uk). You should also take account of any local restrictions which may apply (e.g. local lockdown).

### Determining who should attend the shoot

Protect those at higher risk from COVID-19. This includes those who may be clinically extremely vulnerable (known as the shielded group) and those in the clinically vulnerable group.

- Carefully assess whether those attending from these groups can do so safely
- Consider whether you will have sufficient number of beaters and pickers-up to operate effectively and safely on a shoot day.
- Be aware that those who live with critically vulnerable people may not be able to attend.

From 1<sup>st</sup> August the requirement for shielding will pause in England, however, measures to protect at risk groups attending shoot days should be taken.

### Employees

If your shoot has five or more employees at any one time it is a legal requirement to have a health and safety policy in place. Even if the shoot does not have employees, it still makes sense to document and assess potential risks

In the context of COVID-19 this should include:

- assessment of vulnerability to COVID-19
- assessment of physical ability to undertake the tasks required
- identification of precautions required to help protect everyone involved on the shoot (such as the hygiene and transportation guidelines detailed within this document).

As previously stated, a risk assessment, to the requirements of regulation 3 of the Management of Health and Safety at Work Regulations 1999, is required to be undertaken by law, by anyone organising a gathering which exceeds six people, either indoors or outdoors. The organiser will also be required by law to put in place all reasonable measures to limit the risk of transmission of coronavirus taking into account the risk assessment carried out and any guidance issued by government which is relevant to the gathering.

The conduct and requirements of each employee should be clearly outlined and agreed before shooting commences, for example in a letter to those involved in the shoot in advance of their first attendance.

A clear safety brief, including risks and actions in response to COVID-19 should be given prior to each shoot.

### Travel

Consider any restrictions on travel which may impact the shoot day. There may be restrictions on distances which can be travelled, and limitations on who can travel together e.g. only those from the same household.

### Accommodation

Consider any restrictions on accommodation and the hospitality sector and communicate these to visitors, as it may impact their ability to attend the shoot. Accommodation is permitted to open so long as operators can comply with government guidance on hygiene and social distancing.

From 14 September social gatherings indoors, including in accommodation settings, will be limited to no more than six individuals. Business premises may host more than six customers inside their premises, however social distancing must be maintained, no social group may exceed six people and there must be no social interaction between groups

### Visitors from abroad

Have a discussion with any visitors from abroad who are due to attend the shoot. There may be quarantine rules for those arriving from overseas which would need to be observed before they can visit the shoot. They may also need to consider quarantine in their own country when they return home. Refer to government guidance for further information and guidance.

### Gatherings

New government regulation came into force in England on Monday 14 September, restricting social gatherings to no more than six people both indoors and outdoors, unless a specific exemption applies.

The limitation on gatherings does not apply to physical activity which is carried on outdoors and for which a licence, permit or certificate issued by a public body to carry on the activity,

or for any of the equipment used for the purposes of the activity is required. Such a license, permit or certificate must be held by the gathering organiser, or any person taking part in the activity.

Shoots are encompassed by this exemption, where the organiser or member of the gathering holds a shotgun certificate.

The shoot' organiser acting within this exemption is legally required to prepare a risk assessment in accordance with regulation 3 of the Management of Health and Safety at Work Regulations 1999. The organiser will also be required by law to put in place all reasonable measures to limit the risk of transmission of coronavirus taking into account the risk assessment carried out and any guidance issued by government which is relevant to the gathering.

The exemption does not include gatherings indoors, which must not exceed six people unless from the same household. Shoots operating as a business may host more than six customers inside their premises, however social distancing must be maintained, no social group may exceed six people and there must be no social interaction between groups.

Employees are exempt from gathering limits where their gathering is necessary for work purposes.

Further guidance on gatherings related to provision of meals on the shoot can be found in the 'Provision of food and refreshments' section of this document.

### **Considerations on the day of the shoot:**

#### COVID-19

Anyone displaying symptoms of COVID19, or who shares a household with any individual displaying symptoms, must not attend the shoot day.

Keeping COVID-19 out of the shoot is the most effective way to minimise the risk of infection. Anyone with symptoms, or who has, or may have been exposed to COVID-19 within 14 day prior to the shoot must not attend and should follow government guidance on self-isolation.

Shoots must comply with government guidance to support NHS 'test and trace' efforts. Further information and relevant guidance can be found <https://www.gov.uk/guidance/nhs-test-and-trace-workplace-guidance>.

#### Arrival at the shoot

Congregation of the shoot party, beaters, pickers-up or others poses transmission risk for COVID-19. Social distancing measures should be put in place and gathering limits followed in accordance with government guidelines. Measures to reduce risk might include:

- Reducing the time between arrival of participants and the start of the shoot day
- Distancing vehicles in car parks
- Asking people to remain in their own vehicles until the shoot briefing
- Putting social distancing markers in communal areas
- Avoiding indoor spaces, unless able to maintain social distancing and compliance with gathering limits
- Using safe outdoor areas whilst maintaining social distancing

- Increased cleaning of hard surfaces and contact points such as entry gates and door handles
- Where it may be difficult to maintain social distancing outdoors, reduce contact time to less than 10 minutes
- Having one person controlling access points to reduce contact by multiple individuals

As a general measure, you may consider separating the group into smaller 'bubbles' which remain separate from one another. By avoiding mixing of individuals outside of these bubbles, it reduces the risk of transmission of COVID-19 and potential impacts on future shoots days in the event that an individual involved in the shoot contracts COVID-19.

### Shoot Briefing

As well as the usual safety briefing, all participants in the shoot day should be informed of the precautions and guidance in place to protect against COVID-19 and agree the responsibilities of all parties prior to the shoot commencing. When conducting the shoot brief you may consider:

- Provide a written briefing prior to the shoot, by email, and have guns acknowledge their responsibilities by return
- Brief participants outdoors where safe to do so, ensuring social distancing is maintained
- If briefings are undertaken indoors you must conform to regulation on gathering limits indoors, you should take steps to ensure that social distancing can be maintained, keep time spent indoors in groups to the minimum required to deliver the safety briefing, open windows and doors to increase flow of air into the room.
- If possible, introduce a one-way system to facilitate access and egress
- Consider alternatives to drawing pegs, such as one individual doing the draw, observed by other guns.

### Transportation

Where possible, travel around the shoot should be on foot, as this allows social distancing to be maintained and reduces the risk of COVID-19 transmission.

If practicable, individuals or household groups should travel in separate vehicles. Transport should be planned well in advance of the day to ensure appropriate provision is in place. Parking arrangements around the shoot should also be considered, to ensure that multiple vehicles can be accommodated safely and without impacting others countryside users.

Where a vehicle / transport is used for multiple occupants, shoots should refer to the relevant Government guidance on travel. If using transport around the shoot, you may consider:

- Physical social distancing between passengers (currently 2m, or from 4<sup>th</sup> July 1m+ mitigation)
- Sitting side-by-side, not face to face.
- Increasing ventilation in the transport
- Using a 'partnering system' with fixed teams always travelling together. E.g. separate teams / vehicles for stops, beaters, pickers-up
- Hand hygiene – using hand washing facilities or hand sanitizer before and after each journey
- Organise drives to minimise travel times, and therefore length of potential exposure to COVID-19

- Clean transport between passengers, especially contact points (e.g. doors, handrails) before and after each journey
- Enhanced cleaning of shoot transport before and after each shoot
- Minimise touching of surfaces within the transport and avoid touching dogs
- It would be good practice for those travelling with multiple occupants to wear face coverings in line with government guidance for using public transport in England.

### Equipment

Sharing equipment on shoot days increases the transmission risk of COVID-19. To reduce the risk, you may consider:

- Issuing equipment to individuals, which is not shared (e.g. flags for stops) ensuring such equipment is cleaned thoroughly before and after use
- Issue shoot radios to individuals and do not share them. Ensure they are thoroughly cleaned before and after use.

### Socialising

All Government regulation on social distancing and limits on gatherings in place on the day of the shoot must be followed.

Socialising should take place outside where possible and safe, avoiding the congregation of many people in a small space (such as a shoot hut). Any indoor space should be configured so that social distancing can be observed. If possible, introduce a one-way system to facilitate access and egress and increase ventilation to the space. Consideration should also be given to increased handwashing and increased cleaning / sanitising of surfaces.

Any gathering indoors must not exceed six people unless from the same household or where a specific exemption applies.

Businesses may host more than six customers inside their premises, however social distancing must be maintained, no social group may exceed six people and there must be no social interaction between groups.

### Provision of food and refreshments

Many shoots will provide food and refreshments. The provision of food and refreshments is a high-risk area for transmission of COVID-19. To reduce the risk you may consider:

- Asking people to bring their own food and refreshments. These should not be shared.
- Provision of adequate handwash facilities or hand sanitizing points
- Avoiding indoor facilities, unless social distancing can be maintained – this should include any seating areas.
- Observe limits on the number of people who may gather indoors
- Use safe outdoor areas whilst maintaining social distancing
- Putting queue management and/or one-way systems in place
- Using Perspex screens in serving areas
- Do not offer 'buffet / self-serve' options as shared serving implements increase transmission risk
- Enhanced cleaning regimes for surfaces, equipment and regular waste removal
- Where contract / outside catering is use, ensure a copy of their COVID-19 risk assessment is provided and that the service they provide is compliant with government guidance for the sector

- use of face coverings in enclosed spaces.

Refreshment breaks (e.g. elevenses) may be taken outdoors during the shoot day. During such breaks, all participants must maintain social distancing, and appropriate hygiene measures must be in place.

Shoot meals (e.g. shoot lunch) do not fall within the exemption for gatherings which apply to shooting. Shoot meals must therefore conform to the 'rule of six' whether hosted indoors or outdoors.

Shoots operating as a business can host a meal for more than six people in total however no social group may exceed six people, social distancing must be maintained, and there must be no social interaction between individual groups.

Shoots not operating as a business must not host meals for more than six individuals in total on the shoot premises, whether indoors or outdoors.

Shoot parties may visit pubs or restaurants for their shoot meals but must be in separate groups of six and must not socially interact between groups.

Further guidance on food hygiene during the Covid pandemic can be found <https://www.gov.uk/government/publications/covid-19-guidance-for-food-businesses/guidance-for-food-businesses-on-coronavirus-covid-19>.

#### Handwashing and hygiene:

Frequent handwashing or hand sanitising are effective ways to reduce the risk of transmission of COVID-19. You should consider ways to improve and increase the frequency of handwashing and sanitising on shoot days. Measures may include:

- Advising individuals to bring hand sanitizer with them on shoot days and follow guidance on hand washing
- Providing additional hand wash facilities where practicable
- Providing additional hand sanitising points / hand sanitiser
- Use signage to reinforce messaging about frequent hand washing and avoidance of touching surfaces

Enhanced hygiene practices in communal areas will reduce the risk of transmission of COVID-19 from surfaces. Special attention should be paid to high-use communal areas such as washrooms and toilets.

Use of PPE such as gloves and face coverings may help improve hygiene and reduce transmission. Refer to government advice on use of face coverings.

Increase provision of waste bins may help improve hygiene. Take appropriate precaution when disposing of waste, including use of gloves and thorough hand washing after emptying waste bins. For disposal of PPE such as face coverings or waste which may have been contaminated with COVID-19, you should follow relevant Government guidelines <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>.

### Informing Others:

With a rise in public access to rural areas, shoot organisers should consider other land users such as walkers who may be present on shoot days. This will increase other risks associated with the shoot day, as well as potentially increasing COVID-19 transmission sources – for example at gates, styles etc.

### **Guidance for the beating line:**

Whilst beaters, flaggers and stops usually maintain distance between themselves during a drive, in addition to the general guidance outlined to reduce the risk, you may also consider:

- Maintain social distancing whilst walking to, entering drives and once the drive has finished;
- Maintaining social distancing when waiting to cross obstacles such as fences, styles etc.
- Plan routes around the shoot to avoid crossing points where practicable, or use gates to minimize contact transmission
- Washing or sanitizing hands after crossing obstacle which others may have crossed / touched (fences, styles, gates etc.)
- Nominate a person to oversee hygiene measures and sanitizing throughout the shoot day

### **Guidance for picking-up:**

Whilst pickers-up usually operate in a socially distanced way during each drive, there are areas which create COVID-19 transmission risk. In addition to the general guidance outlined to reduce the risk, you may also consider:

- Pickers-up travel in their own vehicles around the shoot
- Bring their own equipment, or be issued with equipment that is not shared
- Minimise handling of shot game, using a game carrier where appropriate
- Maintain social distancing by avoid handing shot game to other persons, including the game cart operator (see section on game handling for further details)
- Avoid touching dogs belonging to other people

### **Guidance for guns / shoot party:**

In addition to the general guidance for pre-shoot information, arrival at the shoot and transport, there are further areas of COVID-19 transmission risk which may need to be considered for a teams of guns / shoot party.

### Cartridges

If the shoot supplies cartridges for guns, then you may wish to consider how this can be done whilst reducing potential for contact transmission of COVID-19. Measures may include:

- One individual handling cartridges, ensuring appropriate handwashing measures and PPE if appropriate;
- Providing cartridges at a safe, centralized location, supervised by the provider, and ensuring that those collecting maintain social distancing;

Empty cases could also allow transmission of COVID-19 between individuals. To reduce the risk you may wish to consider:



- Asking guns to collect their own empty cases with disposal points on each drive
- One person collecting empty cases at the end of each drive, using appropriate PPE such as nitrile gloves, ensuring thorough hand washing or sanitizing before and after collecting.
- Liaise with your local disposal or recycling agent and follow their COVID secure guidelines they may have for disposal of accumulated cartridge cases.

### Loading

Loading, whether for single gun or double guns, requires individuals to operate within 1m of one another. Unless the loader is from the same household, this breaches guidance on social distancing. As such loading should only take place if absolutely necessary, following the Government guidance for 'close contact' services <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/close-contact-services>. Individual shoots should also take into account any additional implications for health and safety from following this guidance.

Loading for double guns poses a higher risk than single gun loading, due to the constant handling and transfer of guns. Appropriate cleaning and sanitising precautions should be in place for all shared equipment in line with Government guidance. Any cleaning products should be appropriate / safe for their intended purpose.

Those chaperoning novice guns for safety should also follow Government guidance for 'close contact services', again taking into account any further health and safety risks arising from following this guidance. It may be appropriate to exclude novice shooters where appropriate close supervision is not possible.

### **Guidance for handling of shot game:**

Shoot managers must ensure they have appropriate arrangements in place for the sale or consumption of the anticipated bag in advance of all shoot days and that all game is handled in accordance with established game handling and hygiene requirements. These requirements can be found here <http://www.codeofgoodshootingpractice.org.uk/>

### Game cart

To ensure social distancing and reduce transmission risk consider:

- Where safe, one individual operating the game cart, if not possible measures should be put in place (such as those for beaters transport) to reduce transmission risks
- Washing or sanitizing of hands before and after handling shot game
- Use of PPE such as nitrile gloves for handling shot game, a new pair each drive with appropriate waste disposal points
- Maintenance of social distancing when loading and unloading shot game
- Enhanced hygiene practices for the game cart, including regular cleaning of high contact surfaces

### Game larder

Loading and unloading of game to the shoot larder may present a transmission risk. To reduce risk consider:

- Maintain social distancing, measures may include one person unloading game into / out of the larder where safe, or processes to ensure 2m distancing can be maintained

- Enhanced cleaning of contact points with products which are safe for use around food items. Paying particular attention to larder doors, switches or other high contact surfaces;
- Washing or sanitizing hands before and after using the larder;
- Use of PPE, such as nitrile gloves when handling shot game
- If you are transporting shot game to a game dealer or having shot game collected by them, ensure that you are aware of and follow protocols which the game dealer may have in place and visa versa.

### Game supplied to guests

Game supplied at the end of the shoot may present a transmission risk due to multiple handling. To reduce the risk you may consider having one central collection point, where social distancing can be observed.

The same measures may apply to oven ready game which is often provided to guests. Maintaining the 'cold chain' for processed game immediately prior to its collection should also be considered.

### Payments

You should consider the transmission risk associated with handling cash or cheques in relations to payments for shooting. Electronic payment is the lowest risk option for payments and should be used where practicable. Where physical payments are made, enhanced hygiene process should be considered as well as measures to ensure social distancing requirements are met.

### **Further information:**

If you require further information or support, please contact your local BASC office.

### **Resources**

The following resources may be useful in preparing to address the risk of COVID-19 on the shoot:

- BASC Coronavirus Guidance

<https://basc.org.uk/coronavirus/>

- Code of Good Shooting Practice

<http://www.codeofgoodshootingpractice.org.uk/>

- Government COVID-19 information and guidance

<https://www.gov.uk/coronavirus>

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/construction-and-other-outdoor-work>

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings>

<https://www.gov.uk/guidance/covid-19-guidance-for-mass-gatherings>

<https://www.gov.uk/government/publications/coronavirus-covid-19-meeting-with-others-safely-social-distancing>

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/close-contact-services>

<https://www.gov.uk/government/publications/covid-19-guidance-for-food-businesses>

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/restaurants-offering-takeaway-or-delivery>

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>

<https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers>

<https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own>

<https://www.gov.uk/government/news/coronavirus-covid-19-what-has-changed-9-september>

- Local coronavirus restrictions

<https://www.gov.uk/government/collections/local-restrictions-areas-with-an-outbreak-of-coronavirus-covid-19>

- Health & Safety Executive – COVID-19 Guidance:

<https://www.hse.gov.uk/news/coronavirus.htm>

- DEFRA COVID-19 Information

<https://www.gov.uk/guidance/coronavirus-covid-19-advice-on-accessing-green-spaces-safely>