

Advisory Guidelines: Temporary COVID-19 Dividing Screens

Introduction

The supply of isolation/protection/dividing screens, which are sometimes referred to as “cough” or “sneeze guards” have become prominent during the COVID-19 pandemic. Manufacturers of mass produced vehicles (all SPSVs) are issued with an EC Certificate of Conformity which indicates successful completion of the Whole Vehicle Type Approval testing (ECWVTA) process, ensuring those vehicles of this type can be manufactured and sold throughout the EU without the need for further individual vehicle inspections and testing. Any modifications to the interior of the vehicle may alter the 'type approval' of the vehicle and result in unpredictable consequences in the event of an impact.

Whether a dividing screen should be installed is a matter for operators to consider individually. There is no current Government guidance to suggest that the installation of screens substantially reduces the transmission of Covid-19. Due to the diverse range of vehicles in the SPSV fleet and the variety of dividing screen designs available, it is not possible for NTA to offer specific purchase or installation advice in respect of such equipment.

General requirements

The following guidelines apply to all dividing screens installed after the original manufacture of the vehicle:

- All vehicles must remain complaint with all vehicle standards and requirements specified within the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 to date;
- All vehicles must satisfy the requirements of Road Traffic Act (Construction, Equipment and Use of Vehicles) Regulations 1963 to date;
- All vehicles must remain complaint with all Government health guidance and requirements; and
- All intended modifications to a vehicle **must be notified to vehicle insurers**. Confirmation from the insurance provider indicating that they have been notified is required at the test centre.

It is vital for operators to analyse the fine print in all dividing screen supplier information; it often includes disclaimers in relation to safety aspects of their product or design, particularly in relation to airbags or rigidity of the screens amongst other provisos.

Specific Requirements

If a dividing screen is installed in a vehicle licensed for SPSV use, NTA requires the following specific requirements to be satisfied:

- The installation and/or design of the device must not adversely influence, change or interfere in any way with M1 type approval;
- Sufficient legroom must remain (650mm minimum) for passengers in the second seating row;
- Where a **full** dividing screen is installed in a wheelchair accessible vehicle, an intercom and induction loop must also be installed to facilitate communications with passengers who may have difficulty hearing;
- Installation and maintenance of a dividing screen should be in full accordance with the manufacturer's specification and recommendations, and installed by a named person with the technical knowledge and training required;
- The installed dividing screen should not be significantly changed or modified from the original manufactured design. In cases where it is necessary to modify the original design of the dividing screen, assurances should be obtained from the supplier/installer to ensure any such modification does not compromise the overall safety of the dividing screen or compliance with vehicle standards or safety legislation;
- Dividing screens must remain clear and be free of scratches, clouding or stickers which would impede the visibility for the driver or passenger. The dividing screen must also be clear and free of any tint;
- Dividing screens must be made from a shatterproof material so that in the event of any impact no danger would be presented to the driver or passengers. This would fall under general health and safety requirements in the workplace. Test certification to a known test standard must be sought to ensure that the material used has been proven to be shatterproof, and the supplier should have access to this information;
- Dividing screens must not present a hazard to passengers entering or alighting from the vehicle;
- Dividing screens either through the design or the material used must not impinge upon any original field of vision;

- Safety belt anchorages must not be used to secure the dividing screen. Dividing screens must not hinder the normal operation or obstruct in any way the safe operation of any seat belt within the vehicle;
- Dividing screens must not hinder or obstruct the normal operation of head restraints;
- Dividing screens must not hinder or obstruct the deployment of airbags including: driver, passenger, side-curtain, seat-mounted, door-mounted, B and C-pillar mounted side-impact, knee bolster, inflatable seat belt or additional safety systems installed in the vehicle;
- No sharp edges may be present due to the design or installation of a dividing screen; and
- All dividing screens must be kept in a safe and hygienic state at all times.

If during the licensing renewal inspection (or during a compliance inspection) of the vehicle, it is found that these guidelines have not been complied with the vehicle may not be licensed or an existing licence may be suspended.

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