

BROMLEYS SOLICITORS LLP

COVID-19 – BACK TO OFFICE BASED WORK WORKING SAFELY RISK ASSESSMENT

V8 20.09.2021
Amendments in red

ISSUE OR REQUIREMENT	ACTION OR MEASURE
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This document has been prepared using the most up to date Government Guidance for Employers, Employees and the Self-employed, on Working Safely during COVID-19 in offices and contact centres, and also includes guidance and reference from other associated material.

Please note that breaches of this Risk Assessment will trigger the firm's disciplinary process. Factors that will be taken into consideration when deciding upon any appropriate sanction are: the frequency of breaches, whether they were deliberate, and the consequences or potential consequences of the same.

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A. Sharing results of risk assessment	
<p>Must have a written Risk Assessment in place and have over 5 employees.</p> <p>Risk Assessment must be done in consultation with workers.</p> <p>Must share results of risk assessment with workers.</p> <p>Organisations with over 50 workers expected to publish results of Risk Assessment on their website.</p>	<p>The draft Risk Assessment is provided to all members of the firm as part of the consultation process.</p> <p>The finalised Risk Assessment is provided to all members of the firm and published on the firm's website.</p> <p>A summary of the salient points from the Risk Assessment is provided to all members of the firm.</p> <p>At regular intervals, which includes after a period of time of any increase or change in working practices, and if deemed necessary before any further changes or increases in working practices, all members of the firm will be consulted.</p>
<p>Must display "Staying COVID-19 Secure in 2020" notice in workplace.</p>	<p>Displayed in firm's main reception area.</p>

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B. Managing Risk	
<p>Need to think about the risks the particular organisation faces and do everything “reasonably practicable” to minimise them. Need to take preventative measures.</p> <p>5 levels of Hierarchy of Control:</p> <ol style="list-style-type: none"><li data-bbox="331 794 1178 1018">1. Eliminate – Do we need to do this job, in this way, at this time? Can we eliminate the need for the employee to be in the workplace, e.g. can they continue to work from home? Is home working a solution that works or does not work? Before deciding to return to working in the office, consider why the change is required.<li data-bbox="331 1050 1178 1153">2. Substitute – Can we do the work in a different way? E.g. home working, changing shift times to reduce the number of people in the office.<li data-bbox="331 1185 1178 1289">3. Engineering controls – Is it feasible to put barriers up between desks or move desks around to create socially distanced workspaces?<li data-bbox="331 1321 1178 1348">4. Administrative controls – What signs and guidance can we use to	

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<p>remind people not to congregate in common areas, to remain 2 metres apart. E.g. hand sanitiser notices, hand sanitiser stations, cleaning equipment and cleaning stations, signage and floor marking to remain 2 metres apart.</p> <p>Personal Protective Equipment – PPE is always the last option. What PPE do we need?</p>	

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<p>C. Who should go to work</p>	
<p>Government advice is to make every reasonable effort to enable working from home as a first option.</p> <p><i>Government is no longer instructing people to work from home if they can, so employees can start to plan a return to the workplace.</i></p>	<p>The majority of the firm’s workers started working from home on 24 March 2020 and will continue to do so where possible in accordance with the government advice.</p> <p><i>All firm’s workers are now back working in the office, save for: (i) those who are self-isolating and (ii) those members of the firm who are unable to work in the office for specified reasons e.g. members of the Childcare Team who share a room with another worker and are conducting a Court hearing. Any workers not working in the office will be working remotely from home.</i></p>
<p>Who needs to be on-site – workers in roles critical for business or organisational continuity which cannot be performed remotely?</p> <p><i>See amendment to first point in this section.</i></p>	<p>There are a minority of the firm’s workers who remained working on site from 24 March 2020, as they were deemed to be in roles that were “critical for organisational continuity and could not be performed remotely”. These workers are responsible for: opening and scanning incoming post, printing and posting outgoing post, banking, dealing with deliveries to the office, assisting those working from home in accessing any material in the office.</p> <p>There are also a minority of members of staff who have either remained on-site since 24 March, or occasionally attended on-site</p>

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	<p>since this date, as they are “key workers essential to the running of the justice system”.</p> <p>Other members of the firm who are not “key workers” have attended at the firm, if they have felt the necessity to do so, but on a very limited basis. This is if they need to attend at the office to collect material required to perform their role, or if they are unable to perform their role or specific task working from home. If this necessity arises, the individual worker is required to inform the reception staff, who are attending at the firm daily (the workers in “critical” roles), so they can manage the amount of workers attending the office each day, to ensure the firm is able to manage and maintain the required social distancing.</p> <p style="color: red;">See amendment to first point in this section.</p>
<p>Plan for the minimum number of workers needed on site to operate safely and effectively.</p> <p style="color: red;">See amendment to first point in this section.</p>	<p>A minimum of two workers are required in order for the continued operation of the wider firm on a remote basis.</p> <p style="color: red;">See amendment to first point in this section.</p>
<p>Monitor the wellbeing of workers who are working from home and help them stay connected to the rest of the workforce.</p>	<p>Team leaders conduct regular team and individual voice and video calls with their team members. Individual workers are actively encouraged to maintain contact by differing means with other workers. These regular contacts are used to share experiences and</p>

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	<p>coping mechanisms.</p> <p>Technology is being utilised in the form of WhatsApp groups, Zoom, Skype and Teams video calls. The adoption of Microsoft Teams across the firm is being actively encouraged as a formal means of the firm staying in touch by a separate “business channel” to assist in the separation of work and homelife.</p> <p>The firm’s Wellbeing Policy has been revised to include the issues arising from the impact of COVID-19 and circulated to the firm.</p> <p>Any workers who are working from home are doing so on a temporary or infrequent basis.</p>
<p>Keep in touch with off-site workers on their working arrangements including their welfare, mental and physical health and personal security.</p> <p>See amendment to first point in this section.</p>	<p>Dealt with in the point above.</p> <p>Dealt with in the point above.</p>
<p>Provide equipment for people to work at home safely and effectively, e.g. remote access to work systems.</p> <p>See amendment to first point in this section.</p>	<p>All workers were asked at the outset of lockdown and reminded throughout to assess their working equipment requirements. Remote access to the “MyBromleys” server access is available across the firm.</p> <p>Remote access facilities remain in place and available to all</p>

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	members of the firm should they need to work from home/remotely.
Firm members who are required or able to return to work, refuse to do so or raise concerns about doing so.	<p>Ensure they are involved in the consultation of this Risk Assessment. Have discussions with individual workers who raise specific concerns in order to address and alleviate their concerns.</p> <p>If a worker requests PPE, but the government guidance is that such PPE is not required, consider supplying the PPE if that would encourage the worker to return to work.</p>
<p>From 05 January 2021 National Lockdown – Stay at Home</p> <p style="color: red;">See amendment to first point in this section.</p>	<p>All firm members are encouraged to work from home if they are able to work from home. The office remains operational for those firm members who feel unable to work from home, or who feel that their wellbeing would be better coming into the office. As solicitors we are key workers, as the services we provide are required to keep the justice system working, to keep the property market moving, we provide Will and administration of estates legal service and the court system is to remain open and working and the Government considers the Courts to be Covid-secure places.</p> <p style="color: red;">See amendment to first point in this section.</p>

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<p>D. Protecting people who are at higher risk</p>	
<p>Consider if any workers are “clinically extremely vulnerable” who have been strongly advised to shield and not to work outside the home (definition: will have received a letter telling them they are in this group or will have been told by their GP).</p> <p>Those who are ‘clinically extremely vulnerable’ are no longer advised to shield.</p>	<p>Individual workers to inform/update the firm if they fall into this category. (If so, has their GP or medical team provided them with any advice with regards their returning to work in the workplace?)</p> <p>Discuss with such workers their individual needs and support them in taking any additional precautions advised by their clinicians.</p>
<p>Consider if any workers are “clinically vulnerable” who are at a higher risk of severe illness and have been asked to take extra care in observing social distancing and should be helped to work from home, either in their current role or in an alternative role. If they cannot work from home, they should be offered option of the safest available on-site roles, enabling them to stay 2 metres away from others, or 1 metre with risk mitigation where 2 metres is not viable, is acceptable. Assess whether this involves an acceptable level of risk. (definition: those aged 70 or over and those with some underlying health conditions).</p> <p>See amendment to first point in this section.</p>	<p>Individual workers to inform/update the firm if they fall into this category. (If so, has their GP or medical team provided them with any advice with regards their returning to work in the workplace?)</p> <p>Discuss with such workers their individual needs and support them in taking any additional precautions advised by their clinicians.</p>

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<p>Providing support for people who are at higher risk “clinically extremely vulnerable” and “clinically vulnerable” around mental health and wellbeing.</p> <p><i>See amendment to first point in this section.</i></p>	<p>The firm’s Wellbeing Policy has been revised to include issues arising from the impact of COVID-19 and circulated to the firm.</p>
<p>Consider if any workers are pregnant.</p>	<p>Individual workers to inform the firm if they fall into this category.</p> <p><i>Discuss with such workers their individual needs and support them in taking any additional precautions advised by their clinicians.</i></p>
<p>Consider if any workers are living with a “clinically extremely vulnerable”, “clinically vulnerable” person or worker who is pregnant.</p> <p><i>See amendment to first point in this section.</i></p>	<p>Individual workers to inform/update the firm if they fall into this category. (If so, has their GP or medical team provided them with any advice with regards their returning to work in the workplace?)</p> <p><i>Discuss with such workers their individual needs and support them in taking any additional precautions advised by their householder’s clinicians.</i></p>
<p>Enable workers who have symptoms of COVID-19 to self-isolate (current guidance is 10 days) and if appropriate work from home, including those workers who live in a household with individuals who have tested positive for COVID-19 <i>unless exempt from self-isolation i.e. they have received both vaccines and it has been more than 14</i></p>	<p>All members of the firm are required to immediately inform a member of the firm’s Management Team if: (i) they contract COVID-19, (ii) they develop symptoms of COVID-19, (iii) they live with someone who contracts COVID-19, or (iv) they live with</p>

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<p>days since their second vaccine, or the “NHS test and trace” system has advised to self-isolate.</p>	<p>someone who develops symptoms of COVID-19.</p> <p>Information has been circulated to the firm confirming the options available for testing for COVID-19. The firm has access to the government’s COVID-19 employer testing portal and is therefore able to request tests for applicable firm members if required (currently limited to certain members of the workforce). Portal now closed.</p> <p>All members of the firm are required to notify the firm’s Practice Manager if: (i) they decide to be tested for COVID-19 (outside the COVID-19 testing employer portal) and to confirm the outcome of the test, and (ii) if a member of their household decides to be tested for COVID-19 and to confirm the outcome of the test.</p> <p>The firm has circulated a <u>COVID19 Symptoms and Self-Isolation Guide</u> in this regard.</p>

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E. Equality in the workplace	
Understanding and considering the particular circumstances of workers with different protected characteristics.	The protected characteristics are: <ul style="list-style-type: none">• age;• disability;• gender reassignment;• marriage and civil partnership;• pregnancy and maternity;• race;• religion or belief;• sex;• sexual orientation.
Involving and communicating appropriately with workers whose protected characteristics might either expose them to a different degree of risk.	Individual workers to inform/update the firm if they fall into this category.

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Consider if measures or adjustments are needed to take account of duties under the equality legislation.	Dependent upon the responses provided.
Make reasonable adjustments to avoid disabled workers being put at a disadvantage and assessing the health and safety risks for new or expectant mothers.	Dependent upon the responses provided.
Make sure the steps taken do not have an unjustifiable negative impact on some groups compared to others, e.g. those with caring responsibilities or those with religious commitments.	Dependent upon the responses provided.

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F. Social distancing at work	
<p>Where home working not possible, make every reasonable effort to comply with social distancing guidelines, by keeping as many people as possible 2 metres apart, or 1 metre with risk mitigation where 2 metres is not viable, is acceptable</p> <p>Remember that social distancing not only applies to an individual’s workstation, but also entrances, exits, kitchen, toilet, other shared areas.</p> <p>Government is no longer instructing people to work from home if they can.</p>	<p>Signage and other markings are clearly displayed throughout the building reminding all those present to observe social distancing at all times in all parts of the building. (Also see below).</p> <p>Where a distance of 2 metres is not viable, risk mitigation has been put in place being either of the following or a combination of some or all: screens/barriers, workstation move, alternative day working, support for use of PPE.</p> <p>Signage, markings, notices, screens and support for the use of PPE remain in place.</p>
<p>Where social distancing guidelines cannot be followed in full, in relation to a particular activity, consider whether that activity needs to continue for the organisation to operate.</p>	<p>To be determined within consideration for increased return to office working and number of workers on-site at any one time.</p>
<p>Encourage the frequency of handwashing.</p>	<p>Hand sanitiser stations have been installed throughout the building and signage erected advising all attendees to sanitise on entry to the building and frequently thereafter.</p> <p>Signage has been erected at all wash hand basins advising on best</p>

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	handwashing practices.
Encourage the frequency of surface cleaning.	<p>Signage has been erected throughout the building advising on frequency and methods of surface cleansing.</p> <p>A clear desk policy has been implemented and enforced to ensure all surfaces can be adequately cleaned and work station adjustments made. This is also essential in the event of an outbreak of COVID in the workplace to ensure an effective deep clean of the building and no resulting damage to files, papers, etc.</p>
Keep the activity time involved as short as possible.	Workers are discouraged from gathering in any part of the building, even if socially distanced. This is specifically to minimise worker interactions, congestion, and to speed up the time spent by workers in these areas.
Use screens or barriers to separate people from each other.	<p>A permanent screen has been installed at the main reception desk, movable “sneeze” and “cough” screens have been installed in open boardrooms and interview rooms. Such screens have also been installed at appropriate workstations where required.</p> <p>A letter and parcel drop point has been created in the lower entrance reception of the building with appropriate signage informing attendees, including Royal Mail and DX, on how to notify and deposit deliveries without direct contact with workers.</p>

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<p>Use back-to-back or side-to-side working, rather than face-to-face, whenever possible.</p>	<p>A full assessment of all work stations has been conducted. Where required, desks/work stations have been either be re-positioned, decommissioned, workers moved to a new permanent work station, screens/barriers installed, alternate day working pattern agreed.</p>
<p>Reduce the number of people each person has contact with by using “fixed teams or partnering” so each person works with only a few others.</p>	<p>Non-critical face-to-face meetings should not take place unless absolutely necessary, across the firm. All workers are in teams and encouraged to utilise technology to remain in contact with other teams.</p>
<p>If people must work face-to-face for a sustained period with more than a small group of fixed partners, assess whether the activity can go ahead.</p>	<p>Any critical meetings must take place with adequate screens, adequate ventilation measures (n.b. doors must remain closed for client/visitor meetings for confidentiality) and kept to a minimum duration.</p>

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G. Coming to work and leaving work	
Stagger arrival and departure times to reduce crowding into and out of the workplace.	<p>The firm’s existing signing in and out procedure for both firm members and clients/visitors is to be followed. All firm members attending at the firm must sign in and out whenever they enter or leave the building. Reception will sign in and out any clients, visitors or contractors. The firm has a Policy on on-premises meetings which must be followed by all firm members.</p> <p>All firm members are required to inform reception when they are attending at the firm, so reception can maintain a log/record.</p>
Provide more storage for workers’ clothes and bags.	<p>To be kept under review. Existing hooks/stands must be used.</p> <p>Any surplus/non-essential personal effects and property to be removed from the building.</p>
Using markings introduce one-way flow at entry and exit points and throughout the workplace.	<p>Due to the layout, age and nature of the building, one-way flow is not believed to be practically possible. This will be kept under review.</p> <p>Floor markers and signage has been installed to highlight the 2 metre social distancing rule throughout the building along with</p>

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	<p>taped zones around photocopiers and other multi-user zones.</p> <p>Workers whose workstations are situated on the third floor are to access their workstation as follows:</p> <ul style="list-style-type: none"> • Accounts Team and Costings Team – accounts stairs only, • Family Team and Residential Team – fire exit stairs only,
<p>Provide handwashing facilities, or hand sanitiser where not possible, at entry and exit points.</p>	<p>Original hand washing facilities are all open and supplied with antibacterial wash and paper towels, along with signage on hand washing guidance.</p> <p>Laundered towels no longer to be supplied.</p> <p>Hand sanitiser stations and signage have been installed throughout the building at entry points and regular intervals on each floor. Usage will be kept under review to determine future requirements.</p>
<p>Try not to use touch-based security devices such as keypads and manual signing in systems.</p>	<p>Manned entry points were deactivated whilst the building was closed to the public, and during that time alternative entry security methods were put in place. Now that the building is partially open to the public, the current security devices and keypads have had to be re-activated.</p>

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	The firm's existing signing in and out procedure for both firm members and clients/visitors is to be followed. All firm members attending at the firm must sign in and out whenever they enter or leave the building.

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H. Moving around the building and workstations	
Reduce movement by discouraging non-essential trips and restricting use or access to some areas.	<p>The second floor communal kitchen is the “brew station” for the workers on the second floor.</p> <p>The second floor communal kitchen is to be used by workers on the second and third floor for refrigerating packed lunches and accessing drinking water.</p> <p>The first floor communal kitchen is the “brew station” and for refrigerating packed lunches for the workers on the first floor in that part of the building, and for all workers on the first floor to access drinking water.</p> <p>The first floor “brew station” is for the workers in that part of the building and for refrigerating packed lunches.</p> <p>Two brew stations have been installed on the third floor in:</p> <ul style="list-style-type: none">(i) the room to the left at the top of the second floor fire exit stairs; this “brew station” is to be used by the Family Team and Residential Team on the third floor, and(ii) the first room that is entered at the top of the second floor “accounts” stairs; this “brew station” is to be used by the

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	<p>Accounts Team and Costings Team.</p> <p>There is to be no food preparation in the building. Food and drink can be consumed on the premises. Food preparation can now take place in the building. Microwaves and toasters have been reinstated.</p> <p>The second floor Boardroom has a maximum occupancy of 6 people, with the use of the screen that has been installed and ventilation compulsory (n.b. doors must remain closed for client/visitor meetings for confidentiality).</p> <p>The first floor boardroom has a maximum occupancy of 8-10 people, with the use of the screen(s) that have been installed and ventilation compulsory (n.b. doors must remain closed for client/visitor meetings for confidentiality).</p> <p>Chairs from each boardroom have been removed to permit social distancing.</p> <p>Interview room 1 has a maximum occupancy of 2 persons, with the use of the screen that has been installed and ventilation compulsory (n.b. doors must remain closed for client/visitor meetings for confidentiality).</p> <p>Interview room 2 has a maximum occupancy of 2 persons, with</p>

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	the use of the screen that has been installed and ventilation compulsory (n.b. doors must remain closed for client/visitor meetings for confidentiality).
Introduce one-way flow systems	<p>Due to the layout, age and nature of the building, one-way flow is not believed to be practically possible. This will be kept under review.</p> <p>Floor markers and signage has been installed to highlight the 2 metre social distancing rule throughout the building along with taped zones around photocopiers and other multi-user zones.</p> <p>Workers whose workstations are situated on the third floor are to access their workstation as follows:</p> <ul style="list-style-type: none"> • Accounts Team and Costings Team – accounts stairs only, • Family Team and Residential Team – fire exit stairs only,
Encourage regular cleaning of areas/equipment that is multi-use i.e. photocopiers, telephones, door keypads.	<p>Antibacterial wipes and hand sanitiser are available at all photocopiers. There is a stock of antibacterial wipes and sprays available for all workers use on each floor.</p> <p>Signage has been erected to remind workers of the need for continual cleaning of workstations and any communal equipment.</p>

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	The entire building is cleaned each week day by an external cleaning company.
Regulating the use of high traffic areas including corridors.	Floor markers and signage has been installed to highlight the 2 metre social distancing rule throughout the building, along with taped zones around photocopiers and other multi-user zones. Signage has been erected on the entry points and throughout the building reminding workers and visitors of the rules.
Reduce maximum occupancy for lifts and provide hand sanitiser for the operation of lifts. Encourage the use of stairs instead where possible.	Signage has been erected confirming maximum occupancy in the lift of 1 person. There is a hand sanitiser station at the entry to and exit from the lift.
Make sure that people with disabilities are able to access lifts.	The lift remains available for use subject to maximum occupancy, although exceptions will apply in the case of those requiring assistance with carers or from the same household being permitted.
Encourage regular cleaning of door handles and door push plates	There is a stock of antibacterial wipes and sprays available for all workers use on each floor. Signage has been erected to remind workers of the need for

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	continual cleaning of workstations and any communal equipment. The entire building is cleaned each week day by an external cleaning company.

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I. Complying with fire safety regulations	
General point	<p>Currently there is no relaxation of fire safety legislation and it is the responsibility of the responsible person and/or duty holder to ensure they are testing and maintaining all fire safety measures to maintain a safe premises.</p> <p>In businesses that are still open and operating the routine testing and maintenance of all fire safety measures is essential in keeping people safe to ensure they operate and perform as required in event of fire.</p>
Fire doors	<p>Fire doors are an important fire safety measure. Keep fire doors closed and follow government advice on hand washing and cleansing hard surfaces.</p> <p>Buildings are compartmentalised to delay the spread of fire from one area to another. These compartments are usually linked by fire doors to allow the flow of traffic around the building. Fire doors have two important functions in a fire: (i) when closed they form a barrier to stop the spread of fire and (ii) when opened they provide a means of escape.</p>
Conducting testing of fire alarm call points and examinations of fire	Weekly tests should continue to take place of fire alarm call points

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escapes/exits	and regular (determined as monthly by the firm) examinations of fire escapes/exits.
Conducting of fire drills	<p>Fire drills are an important part of any successful emergency evacuation procedure and can assist in a safe evacuation in event of fire. It is imperative that everyone understands what to do in event of fire.</p> <p>It is essential all occupants leave a premises and go to the pre-determined Assembly Point in event of fire to ensure their safety. Whilst social distancing may be impacted during evacuation, this can be managed and by following government guidelines on maintaining hygiene at the Assembly Point.</p>

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J. Workplaces and workstations	
Ensure workstations allow social distancing wherever possible.	<p>Work stations have been provisionally assessed for social distancing and have been orientated wherever possible to avoid users directly facing others. Risk mitigation measures where appropriate have been put in place which may include: screens/barriers, move to a new permanent work station, alternate day working system imposed. This is under continual review as use of the building develops.</p> <p>All work stations must be clear of files, papers, other material and personal effects at the end of use to enable thorough cleaning and in the event of an outbreak necessitating a deep clean of the building.</p> <p>Seats have been removed from waiting areas and boardrooms to mandate social distancing. The seating has been reinstated in the ground floor lobby area.</p> <p>The need for barriers/screens will continue to be considered and implemented where necessary, side-by-side working will be used in preference to face-to-face where possible.</p>

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Workstations should be assigned to individuals and not shared.	Each worker to retain and use their original workstation, unless this is not possible due to social distancing in which case a replacement station will be allocated. Thereafter workstations are not to be shared or unless permitted moved.
If it is not possible to keep workstations 2 metres apart, consider whether that activity needs to continue for the organisation to operate.	A workstation may be taken out of use and the worker relocated to a new permanent work station, screens/barriers installed, alternate day working system imposed.
Use floor tape or paint to mark areas to help workers keep 2 metres apart.	Floor tape, floor stickers and signage have been installed to implement social distancing.
If needed and possible, move workstations 2 metres apart. If that is not possible use screens.	<p>Work stations have been provisionally assessed for social distancing and have been orientated wherever possible to avoid face-to-face use.</p> <p>All work stations must be clear of files, papers, other material and personal effects at the end of use to enable thorough cleaning and in the event of an outbreak at the firm necessitating a deep clean of the building.</p> <p>Seats have been removed from waiting areas and boardrooms to mandate social distancing. The seating has been reinstated in the ground floor lobby area.</p>

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<p>Manage occupancy levels to enable social distancing.</p> <p>Government is no longer instructing people to work from home if they can.</p>	<p>All members of the firm are required to inform reception when they are attending the office.</p>

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K. Meetings	
<p>Use remote working tools to avoid in-person meetings.</p> <p style="color: red;">Government is no longer instructing people to work from home if they can.</p>	<p>All firm members are aware of the various video communication methods that are available and are making use of them.</p> <p>There is a disclaimer in the firm’s Terms and Conditions of Business, which is published on the firm’s website, and on the firm’s website page regarding the firm’s Virtual Legal Surgery, with regards security of such communications.</p> <p style="color: red;">In-office meetings and walk-in appointments are now permitted, but the use of telephone appointments and video calls are to continue as an alternative.</p>
<p>If in-person meetings are necessary, maintain 2 metre separation, or 1 metre with risk mitigation where 2 metres is not viable, is acceptable.</p>	<p>Signs and screens to remain in place in boardrooms and interview rooms to meet this requirement.</p> <p>Meetings with clients and/or third parties must only take place in either the interview rooms or boardrooms and not in other rooms in the building i.e. fee earner’s room.</p>
<p>Avoid sharing pens and other objects.</p>	<p>All members of the firm are reminded to keep and use their own stationery.</p>

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	Any clients and visitors will be given a pen to keep if they are required to complete anything in pen whilst on the premises.
Provide hand sanitiser in meetings rooms.	Hand sanitiser has been installed in boardrooms and interview rooms.
Hold meetings in well ventilated rooms wherever possible.	Signs have been erected in boardrooms and interview rooms to confirm the need for ventilation i.e. opening of windows. The opening of doors is not permitted in order to preserve confidentiality.
For areas where regular meetings take place, use floor signage to help people maintain social distancing.	Floor markings have been installed throughout the building. Seating guides are installed in boardrooms advising which seats may be used.
Members of the public visiting the firm are expected to wear a face covering before entering the premises and must keep it on until they leave the premises, unless there is a reasonable excuse for removing it, or unless they are exempt from wearing a face covering.	The firm's has a <u>COVID in-office Meetings Policy</u> detailing the requirements that clients and visitors must meet.

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L. Common areas	
Install screens to protect reception staff and in similar areas i.e. meeting rooms.	A permanent screen has been installed at the main reception desk. Moveable Perspex screens are situated in each boardroom and interview room.
Workers to bring in their own food.	No food is to be prepared in the building. Food preparation is now permitted. Toaster and microwaves have been removed/decommissioned. Toasters and microwaves have been reinstalled. Brew stations are provided for hot drinks – set out above. Workers are encouraged to bring their own drinking water, refreshments and packed lunch, although the firm will continue to provide access to drinking water and hot drinks.
Stagger or set break times to ease pressure on kitchen area.	To be monitored and reviewed in accordance with the easing of lockdown. Sign erected on kitchens door with regards social distancing. Floor marketing outside kitchen doors with regards social

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	<p>distancing.</p> <p>Signs in kitchens on hand washing good practice.</p> <p>Additional “brew stations” have been created.</p>
Create extra common areas from space freed up by those remote working	An additional “brew station” has been created on the third floor.
Use of toilets	<p>Sign erected re: social distancing - only one user at a time in the gents’ toilet on the second floor.</p> <p>It is now permissible for two occupants to enter the ladies’ toilets on the second floor, but one occupant must remain in their cubicle until the other occupant has completely exited the room, before they leave their cubicle.</p> <p>Signs erected in all toilets with regards hand washing good practice.</p>

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M. Accidents, security and other incidents	
In an emergency, e.g. fire or accident, people do not have to stay 2 metres apart if it would be unsafe.	<p>A fire drill will be undertaken once the lockdown restrictions have been lifted and there is an increase in those working in the office.</p> <p>All Fire Marshalls including the PEEPs Fire Marshalls have been asked if they require clarification or guidance in maintaining their role.</p> <p>Fire drills have resumed.</p>
Those involved in the provision of assistance to others should pay particular attention to sanitation measures, including handwashing immediately after and use of gloves, face mask, etc, where possible.	<p>All First Aiders have been asked if they require clarification or guidance in maintaining their role.</p> <p>A sufficient supply of: disposable gloves, aprons, fluid repellent face masks, hand sanitiser, and eye shields, to be obtained for use by the firm's First Aiders.</p> <p>The firm's First Aiders will be given their own supply of the above PPE, to retain at their workstation, which they should seek to replenish if it is used.</p> <p>A supply of disposable gloves should be placed at the side of each First Aid Box, as well as hand sanitiser, for use in the event that an</p>

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	<p>item is required from these boxes.</p> <p>Those involved in the provision of assistance to others i.e. First Aiders will ask those they are assisting before providing the assistance if: they have COVID-19 or symptoms of COVID-19, or if this applies to anyone in their household.</p> <p>The First Aid assistance that is provided by the firm’s First Aiders, will:</p> <ul style="list-style-type: none">(i) as much as possible, observe the current social distancing guidance,(ii) involve the individual who is receiving the assistance to participate as much as possible, in the assistance that is being provided to them, rather than this being provided by the person providing the assistance,(iii) involve the use of enhanced Personal Protective Equipment by those providing the assistance (see above), and(iv) in the event that CPR is required, this will follow the current guidance with regards administering rescue breaths.

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N. Managing clients and visitors	
<p>Encourage clients and visitors to use remote communication where possible.</p> <p>Government is no longer instructing people to work from home if they can.</p>	<p>Notice on firm's website.</p> <p>The firm's legal surgery has been transferred to a virtual legal surgery, which is now conducted either by video communication or telephone.</p> <p>The firm's legal surgery now offers in-office meetings, as well as telephone and video consultations.</p>
<p>If on-site visits are required, site guidance on social distancing, hygiene and not entering the building if they have symptoms or live with someone who has symptoms.</p>	<p>Firm has a <u>COVID in-office Meetings Policy</u>.</p> <p>Signs on front door, in ground floor lobby area, and main reception door on second floor, asking clients and visitors to not enter the premises if they have COVID-19 or symptoms of COVID-19, or if this applies to anyone in their household.</p> <p>Sign in ground floor lobby area and main reception area on second floor, regarding the need to maintain social distancing of 2 metres and use the hand sanitiser upon arrival and departure.</p>
<p>Limit the number of visitors at any one time and limit visitor times to a specific window/time.</p>	<p>On-site visits to be discouraged. If an on-site visit is required, it will preferably be by appointment only although walk-in's are</p>

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<p>Government is no longer instructing people to work from home if they can.</p>	<p>permitted. Reception must be informed, and if possible informed in advance, so they can manage the number of clients and visitors attending the office on any given day.</p> <p>Those depositing documents or parcels are to do so via the document drop box in located in the ground floor lobby area. Those doing so, are asked to telephone the main reception area on the second floor to confirm the delivery, so the delivery can be collected. Hand sanitiser is provided here, with a notice encouraging clients and visitors to use it.</p> <p>No personal parcels/deliveries for workers are to be received at the building.</p>
<p>Determining schedules for essential services and contractor visits, and whether they can be carried out when the workplace is not usually operating i.e. evenings, weekends.</p>	<p>Any external contractual work will be coordinated with the relevant firm member(s) to ensure social distancing and limiting the number of people on the premises.</p>
<p>Maintain a record of all clients and visitors if possible.</p>	<p>Client and visitor log in and out to be maintained by reception. This is also required for fire safety purposes.</p>
<p>Revisit visitor arrangements and how they sign in – use their own pen.</p>	<p>All clients and visitors if needing to complete anything in pen, will be encouraged to use their own pen, or take and keep one of the firm's pens.</p>
<p>Members of the public visiting the firm are expected to wear a face</p>	<p>The firm's <u>COVID in-office Meetings Policy</u> has been updated to</p>

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covering before entering the premises and must keep it on until they leave the premises, unless there is a reasonable excuse for removing it, or unless they are exempt from wearing a face covering.	confirm the new requirement.

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O. Before re-opening	
Workplace cleaned prior to re-opening.	As set out above, the building remained open following lockdown. Third-party cleaning re-commenced some weeks ago. Internal cleaning is being undertaken where deemed required. The firm's cleaning requirements will continue to be monitored and increased as building use grows. The building is cleaned by an external cleaning company each week day.

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P. Keeping the workplace clean	
Frequent cleaning of work areas and equipment between uses, including surfaces and objects that are regularly touched i.e. door handles, keyboards, shared equipment, and ensuring adequately waste disposal.	Frequent cleaning of areas and equipment between uses, to be conducted by workers, and external cleaning contractors. Cleaning solution and equipment has been installed and provided for all shared equipment i.e. photocopiers, together with a waste bin, and at appropriate stations around the building.

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Q. Hygiene – handwashing, sanitation, facilities and toilets	
Use signs and posters to build awareness of: <ul style="list-style-type: none"> • good handwashing technique, • the need to increase handwashing frequency, • avoid touching your face, • cough or sneeze into a tissue and bin this safely 	Appropriate signage has been erected beside wash hand basins and hand sanitiser stations have been installed throughout the building. Everyone is encouraged to notify reception if the supply of handwashing solution or hand sanitiser is running low, at any of the stations where it has been installed.
Provide hand sanitiser in multiple locations in addition to washrooms.	Hand sanitiser has been installed throughout the building as mentioned above.
Signs in toilets to ensure social distancing.	Signage has been installed as mentioned above.
Signs in toilets to ensure they are kept clean.	External contractors clean the building each week day. Cleaning solution and equipment is provided in the toilets with a waste bin and appropriate signage.
Enhanced cleaning for busy areas.	As mentioned above.
Provide more waste facilities and more frequent rubbish collection.	The firm's waste facilities and rubbish collections will be

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	monitored to determine if changes are required. Bin lids have been removed, so all bins are “open top”.

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R. Handling goods and other materials	
Cleaning procedures for goods entering the workplace.	Cleaning material has been installed at the main reception i.e. hand sanitiser and gloves.
Restricting / ceasing non-business delivered i.e. personal deliveries.	No such items are to be delivered to the building until further notice.

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<p>S. Personal Protective Equipment</p> <p>COVID-19 is a different type of risk to the risks normally faced in a workplace, and needs to be managed through social distancing, hygiene and fixed teams or partnering – not through the use of PPE (*see above re: hierarchy of Risk Assessments).</p> <p>Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings.</p> <p>Unless you are in a situation where the risk of COVID-19 transmission is very high, your Risk Assessment should reflect the fact that the role of PPE in providing additional protection, is extremely limited.</p>	<p>The exception to increased PPE relates to that required by those at the firm providing assistance to others i.e. First Aiders, which has been mentioned above.</p> <p>However, the firm does have a supply of face masks and gloves in the event that any firm member wishes to use them.</p>

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<p>T. Face coverings</p> <p>There are some circumstances when wearing a face covering may be marginally beneficial as a precautionary measure. Evidence suggests that wearing a face covering does not protect you but protects others if you are infected. A face covering can be very simple and may be worn in enclosed spaces where social distancing is not possible.</p> <p>Face coverings are not a replacement for other ways of managing risk, including minimising contact.</p> <p>Wearing a face covering is optional and is not required by law.</p> <p>Employers should support their workers in using face coverings safely if they choose to wear one.</p>	<p>Appropriate face coverings will be obtained for the use by those members of the firm who are providing assistance to others i.e. First Aiders.</p> <p>All firm members who are not exempt from wearing a face mask, are to wear a face mask or covering in the office when they are not at their desk or workstation.</p>
<p>Members of the public visiting the firm are expected to wear a face covering before entering the premises and must keep it on until they leave the premises, unless there is a reasonable excuse for removing it, or unless they are exempt from wearing a face covering.</p>	<p>The firm's <u>COVID19 in-office Meetings Policy</u> has been updated to confirm the new requirement.</p>

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U. Shift patterns and working groups	
Where staff are split into teams or shift groups, fix these teams or shift groups so that where contact is unavoidable, this happens between the same people.	This is dealt with above.

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V. Communication and training	
Provide clear, consistent and regular communication. Engage with workforce to confirm and agree any changes in working arrangements.	As is stated above, the workforce has been consulted on this Risk Assessment, and will be consulted at regular intervals, which include after a period of time of any increase of change in working practices, and before any further changes or increases in working practices where deemed necessary.

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<p>W. Response (rapid) to second spike in COVID-19 outbreak and/or outbreak of COVID-19 in office</p>	
<p>Immediate response to second spike affecting the UK</p>	<p>The firm will monitor and observe the government guidance.</p> <p>The firm will follow all instructions from authorities in the event of new local restrictions.</p>
<p>Immediate response to outbreak in office</p> <p>If there is more than one case of COVID-19 associated with your workplace, you should contact your local PHE health protection team to report the suspected outbreak.</p> <p>Outbreak criteria – two or more test-confirmed cases of COVID19 among individuals associated with a specific non-residential setting with illness onset dates within 14 days, and one of:</p> <ul style="list-style-type: none"> • Identified direct exposure between at least 2 of the test-confirmed cases in that setting (for example under one metre face to face, or spending more than 15 minutes within 2 metres) during the infection period of one of the cases, • When there is no sustained local community transmission – absence of an alternative source of infection outside the setting for the initially identified cases 	<p>The firm has nominated two “Points of Contact” (POC) who will lead on contacting the local Public Health England health protection team (to cover absences). They are: Louise Nolan – Practice Manager and Robert Johnston – Financial Controller.</p> <p>The firm will determine and record the number of firm members who have contracted COVID-19 and when they started to develop symptoms and/or when they were diagnosed.</p> <p>The information gathered will also include the level of attendance at the workplace by these workers and who they have worked closely with, so those that they have worked closely with, can be informed, so they can consider and observe the current self-isolation guidance and testing regime.</p>

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<p>If the local PHE health protection team declares an outbreak, you will be asked to record details of symptomatic staff and assist with identifying contacts. You should therefore ensure all employment records are up to date. You will be provided with information about the outbreak management process, which will help you to implement control measures, assist with communications to staff, and reinforce prevention messages.</p>	<p style="color: red;">See information set out above.</p>
<p>How will the firm operate?</p>	<p style="color: red;">This depends upon the severity of the outbreak and who at the firm is affected.</p> <p style="color: red;">If only a minimal number of firm members are affected, it may not require any change to how the firm operates. It may require a certain amount of firm members to work remotely. If a significant number of firm members are affected it may involve the firm considering a return to the same operating level that was imposed at the start of lockdown, which is for some or all of the entire workforce to work remotely from home, apart from a minority of the workers who are deemed to be in roles that are critical for organisational continuity and cannot be performed remotely.</p> <p>Workers who are critical for the organisational continuity are as set out above and are those workers who are responsible for: opening and scanning incoming post, printing and posting</p>

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	<p>outgoing post, banking, dealing with deliveries to the office, assisting those working from home in accessing any material in the office.</p> <p>If one or more of the workers who are deemed to be in roles that are critical for organisational continuity, develops COVID-19 or has symptoms of COVID-19, or lives with someone that has COVID-19 or has symptoms of COVID-19, then alternative workers will be identified and consulted to perform these roles.</p>
Cleaning and sanitation of premises	In the event of an outbreak of COVID-19 in the office, arrangements will be made for the premises to be subject to appropriate cleaning and sanitation, before the premises are utilised.

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X. Additional areas highlighted by Bromleys	
Does the firm require any further or additional IT and hardware to support remote working?	A further internet line has been installed to provide enhanced remote accessibility.
Additional facility for card payments to be made via firm's website.	A contract has been entered into with a third party provider. Installation and roll out is on hold pending the relaxation of the restrictions.
Accepting cash from clients.	All monetary transactions are encouraged to be by electronic means where possible.
Use of petty cash.	All monetary transactions are encouraged to be by electronic means where possible.
Policy on disposal of confidential waste.	The firm's policy is that confidential waste must be confidentially destroyed and not put in normal/household rubbish/waste disposal. If a worker generates material that needs to be disposed of confidentially, they should retain it and return it to the office, either after lockdown or if they visit the office during lockdown and ensure that it is put with the firm's confidential waste.
Virtual surgery to be sent up, to replace the on-site surgery sessions.	Virtual surgery has been set up. Details contained on firm's website. A dedicated email address has been created to use to

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	book a slot. Default to telephone call if necessary/preferred. In-office legal surgery sessions have also resumed, although telephone and video consultations remain as an option.
“Walk-ins”.	<p>All workers are encouraged to conduct client or contractor or external meetings remotely. Where this is not possible, meetings taking place in the building must be via prior arrangement only, which must include liaison with reception regarding the availability of a time slot and facilities. The firm has an in-office Meetings Policy.</p> <p>Reception will control a procedure for arrival via the lower reception. This will involve the log in of the client/visitor, who will be informed where in the building they may proceed to. Any other client/visitor is required to remain outside the building until the lower reception is clear.</p> <p>Walk-ins are now permitted. For existing clients, pre-arranged appointments are encouraged.</p>
Everyone to bring their own crockery and cutlery to work and take this home	Cups, glasses, crockery and cutlery will no longer be cleaned by firm, and are to be taken home and cleaned by provided individual firm members place such items in the firm’s dishwasher or clean the items themselves using the firm’s sinks.

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Future of internal firm meetings: (i) full staff (LTM), (ii) quarterly senior staff, (iii) Management Team (iv) team meetings	<p>Until further notice, all internal firm meetings will take place via video communication.</p> <p>The firm's full staff meetings and senior staff meetings are suspended for the time being.</p> <p>Management Team meetings, Team meetings and quarterly senior staff meetings have resumed in the office.</p>
Introduce and encourage use of Microsoft Teams for internal communications.	This is in the process of being rolled out throughout the firm.
All incoming post to be scanned in.	All incoming post will continue to be scanned in. after the current restrictions have been lifted.
Electronic system for sending items to Accounts.	<p>All transactional requests to the Accounts Team will continue to be by electronic means after the current restrictions have been lifted.</p> <p>The amount of accounts trays throughout the building have been reduced to a minimum.</p>
Consider need for duplicate equipment i.e. set for office and set for home e.g. headphones, foot pedal, keyboard, mouse, etc.	This will be monitored.
Availability of NHS COVID19 Contact Tracing App	All members of the firm have been informed of the availability of

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	the NHS COVID19 Contact Tracing App and have been encouraged to download and use it.