

COVID-19 Risk Assessment

Clipstone Investment Management Limited

This risk assessment has been carried out by Clipstone Investment Management Limited (“CIML” or the “Company”) to determine the risks involved with staff returning to the Company’s offices at 45/46 Albemarle Street, to help mitigate those risks and to protect our staff and other users of the building. This assessment has been carried out in accordance with the Health and Safety Executive’s guidance (<https://www.hse.gov.uk/coronavirus/working-safely/risk-assessment.htm>) and involves:

- identifying what work activity or situations might cause transmission of the virus
- a consideration of who could be at risk
- an analysis of how likely it is that someone could be exposed
- actions to remove the activity or situation, or if this is not possible, control the risk

In line with government guidance we have consulted all employees on our plans to return to the office and changes which will be made to the office environment and the way we work to control the risk of transmission COVID-19. We asked for their views, concerns and suggestions for returning to the office and the practical implications for them of returning to work, including how they would travel to the office and how this may impact on any children on vulnerable people in their households. We have incorporated these views, concerns, and suggestions into this risk assessment.

This risk assessment has been shared with all employees and is published on our website.

How the virus may be transmitted

People can catch COVID-19 from others who have the virus. The disease spreads primarily from person to person through small droplets from the nose or mouth, which are expelled when a person with COVID-19 coughs, sneezes, or speaks. These droplets are relatively heavy, do not travel far and quickly sink to the ground. People can catch COVID-19 if they breathe in these droplets from a person infected with the virus. These droplets can land on objects and surfaces around the person such as tables, doorknobs, and handrails. People can become infected by touching these objects or surfaces, then touching their eyes, nose, or mouth.¹

A study of 318 COVID-19 outbreak clusters in China², encompassing 1,245 confirmed cases across 120 cities, has provided some clues. Researchers discovered coronavirus transmission mostly occurred in the home and on public transport. Only one transmission occurred outside, where social distancing had not been observed.

Transmission may also occur through aerosols produced when breathing, coughing, and talking (tiny airborne particles). Such aerosol transmission would be at significantly higher risk in indoor settings with poor ventilation. Research on aerosol transmission is not yet definitive either way, however some reported outbreaks in enclosed spaces have suggested the possibility of aerosol transmission.

¹ Source – World Health Organisation

² <https://www.medrxiv.org/content/10.1101/2020.04.04.20053058v1>

With respect to the activities and situations of CIML staff that may result in the transmission of COVID-19 by returning to the office, the principal ones are:

- using public transport to travel to and from work
- sharing an enclosed space (the office) with other people for extended periods, with particular risks around using meeting rooms and face to face working
- sharing toilet facilities and high traffic areas such as the corridors, stairwells and lifts with people from other offices in the building
- sharing kitchen facilities
- touching handles and surfaces in the office
- the use of the communal shower in the office building
- contact with visitors to the office

Who could be at risk?

Those principally at risk are the Company's seven members of staff, however any visitors to the office, such as cleaners, couriers, contractors, or anyone who comes for a meeting would also be at risk.

Beyond those who physically come to the office, the households of our staff would also be at risk. Four members of staff have children under the age of 18. Once children are back at school in September, the impact of this on transmission rates is unpredictable, however it is possible that should one of CIML's staff contract the virus they could transmit it to their children who in turn could pass it on to their teachers and classmates once they have returned to school. Any vulnerable people within households of CIML's staff must also be considered. While none within households have been identified, members of staff do have wider family members who they are able to see now under government rules, including older family members who may be at greater risk from serious illness or worse if they contracted the coronavirus.

How likely is exposure to the virus?

This is a difficult question to answer as it depends on a number of factors, the virus is not visible and many people carrying the virus are asymptomatic. What we do know though is that spending time in enclosed spaces heightens the risk, as does increasing the number of people one comes into contact with and abiding by social distancing guidelines helps reduce the risk. Environments like the London Underground pose a heightened risk as the space is small, poorly ventilated, and social distancing can be impossible if it's busy. Other forms of public transport may also make social distancing difficult to observe and require one to be in an enclosed space with other people for an extended period of time.

Being in the office also poses an increased level of risk compared with working from home. It is an enclosed space, with multiple people from different households where staff would spend long periods of time every day. If a person with the virus was in the office there would be a high risk that they would leave particles of the virus on surface which others touch, and a risk that the virus could be transmitted from droplets emitted when breathing, coughing, sneezing or talking, even if social distancing is maintained.

Given that we are a small team of only seven people, and we have a reasonable amount of space in the office this reduces the risk, however it does not eliminate it.

Actions to remove or control the risks

The guidance provided by the Health and Safety Executive is that “Everyone who can work from home should do so”, and that to help staff work from home businesses should provide any equipment that they need.

We acknowledge this guidance and will continue to permit all staff to work from home and support them to be able to do so. We also recognise that some staff wish to return to the office as they find working from home difficult and feel that returning to the office will help their productivity and mental wellbeing. We therefore plan to reopen the office in September 2020 for any staff who wish to return to the office. In order to enable staff to return we will put in place the following measures and rules to minimise the risk of transmission of the virus and make the office “COVID-secure”:

- Staff should adhere to the landlord’s “office operation rules and regulations” for the shared spaces in the building (copies have been shared with all staff).
- CIML will operate a “one-way” system for staff entering and leaving the building and for any visitors. Staff should enter via number 45 and leave via number 46.
- The lifts should only be used to go up or avoided altogether. Staff should only use the lift one person at a time if they do use it.
- Desks will be positioned so that all workstations are more than 2 metres apart and to avoid face-to-face working, or Perspex screens will be installed where desks are face-to-face.
- Windows should always be left fully open unless the weather makes that problematic.
- Staff should always abide by social distancing guidelines.
- Meeting rooms should not be used for internal meetings and should not be occupied by more than one person at a time. Phone calls should be made and take where possible in meeting rooms using mobile phones to minimise the risk of aerosol and droplet transmission from extended periods of talking in the main office space.
- Internal meetings should be kept to a minimum and ideally performed outside or if in the main office space while maintaining as much distance as possible.
- Staff should ensure they are washing their hands on entering the office and frequently during the day. Hand sanitisers will be made available around the office, including at the entrances/exits.
- All desks should be left clear at the end of each day so that the surfaces can be properly cleaned.
- The office will be thoroughly cleaned at the end of every day, including sanitising cupboard and door handles.
- Door handles and the kitchen area will be sanitised by a member of staff (please volunteer!) at lunchtime in addition to the daily clean.
- Signage will be placed around the office reminding people to stick to social distancing rules and to wash their hands. Tape will also be placed on the floor to designate 2m from desks, the kitchen area and the printer.
- Toilets will also be cleaned thoroughly. Staff should use the bleach spray and paper towels provided by the landlord to disinfect the WC and sink after they have used it.
- Meetings with non-staff members or staff members working from home should be done virtually using video conferencing software. This will avoid the need to have visitors in the office in most situations.
- Visitors to the office should be kept to a minimum. Staff should follow landlord rules on deliveries. Any business meetings should be held virtually, but if a face to face meeting is essential then this should be carried out ideally in an outdoors setting such as a coffee shop or restaurant. Using the office should be a last resort and social distancing should always be maintained.

- Personal items including coats and umbrellas etc. should be kept by workstations and not left in communal areas.
- Staff should make their own drinks and ensure they use clean and sanitised mugs and glasses. Mugs and glasses will be washed by the cleaners at the end of the day.
- Staff are encouraged to wear masks where maintaining a 2m+ distance is not possible within the office, and to wear a mask when using the lifts, corridors and stairwells when entering and leaving the building out of courtesy to other users of the building.
- Staff should avoid public transport where possible. If staff do use public transport, we encourage them to use it at times when suitable social distancing is possible.
- If any member of staff has any of the symptoms of coronavirus³ they must not come into the office for 14 days from when they first developed symptoms unless they test negative for coronavirus. Results of the test must be shared with Toby Dean.

Protecting vulnerable workers

We are mindful that Public Health England report⁴ that disparities in the risk and outcomes of COVID-19 shows that some groups of people may be at more risk of being infected and/or an adverse outcome if infected.

The higher-risk groups include those who:

- are older males
- have a high body mass index (BMI)
- have health conditions such as diabetes
- are from some black, Asian or minority ethnicity (BAME) backgrounds

We do have a member of staff who fits into one of these categories. Staff will undoubtedly also have contact with people from higher risk groups outside of work.

While there are no expectations of additional controls for these groups, we will ensure that the measures outlined above will be applied stringently and emphasise the importance of this to all staff to help protect more vulnerable individuals. If any member of staff is concerned about returning to the office due to a health condition, they, or a member of their household or family may have, they should discuss their concerns with Toby Dean.

Conclusion

Following this risk assessment, the Company's policy remains that staff may continue to work from home, and we will provide the support necessary to enable staff to do so. We do recognise however, that some staff wish to return to the office and therefore we will put in place the measures and rules outlined above to minimise the risk of contracting the virus whilst at work. We require all staff to abide by these rules and acknowledge that they have read and understood this risk assessment.

Richard Demarchi (Finance Director)
August 2020

³ <https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms/>

⁴ <https://www.gov.uk/government/publications/covid-19-review-of-disparities-in-risks-and-outcomes>

CIML**COVID-19 RAG Risk Assessment**

Risk	RAG Rating	Mitigation Measures
Using public transport to travel to and from work		Staff should aim to travel via other means where possible. Where not possible, staff should travel at times where social distancing is possible. Staff should wear masks in line with the law whilst on public transport and should wash their hands thoroughly when arriving at the office. We also recommend staff carry hand sanitiser and use it when getting off the train/tube/bus.
Sharing an enclosed space (the office) with other people for extended periods, with particular risks around using meeting rooms and face to face working		While we are a small office with only seven people and adequate space to social distance, there is a risk from sharing enclosed spaces for long periods with people not from the same household. We will put measures in place as outlined above to make the office COVID-secure. These measures are however only effective if staff properly adhere to them, and there is a risk that people let their guard down or become jaded with such measures. As we go into winter it will also become more difficult to keep windows open to provide the best possible ventilation in the office and to hold meetings in outdoor spaces.
Sharing toilet facilities and high traffic areas such as the corridors, stairwells, and lifts with people from other offices in the building		There is a medium level of risk as non CIML staff use these facilities and we cannot control or observe their actions. However, the landlord has provided cleaning products so that those using the showers can sanitise them before and after use.
Sharing kitchen facilities		These facilities are only for the use of CIML staff. They will be cleaned twice a day. Staff are encouraged to wash or sanitise hands before and after making themselves drinks or using the fridge.
Touching handles and surfaces in the office		These will be cleaned twice a day. Staff should wash hands regularly and avoid touching their faces. Handles to entrances and exits may be touched by people outside of CIML staff which increases the risk. Touching surfaces is something people do regularly and without thinking about it and so it makes remembering to wash hands after touching something someone else has touched or been near for an extended period of time more difficult than when using the kitchen.

The use of the communal shower in the office building		There is a medium level of risk as non CIML staff use these facilities and we cannot control or observe their actions. However, the landlord has provided cleaning products so that those using the showers can sanitise them before and after use. Showers will also only be used irregularly, unlike toilets.
Contact with visitors to the office		The policy is to have no visitors in the office unless unavoidable. Some people like cleaners or contractors will have to access the office. We have less control and oversight over their actions and adherence to our policies so there is a heightened risk, but we can arrange it so that the risk is limited by having visitors in when no staff are in. Any business meetings should take place virtually or in an outdoors setting unless unavoidable. Meetings taking place in meeting rooms would be fairly high risk as they are small, enclosed spaces and you would naturally sit face to face when having a meeting.
Business Continuity		If the virus was spread around everyone in the office there is a business continuity risk. There would be at least a 2-week period where everyone had to self-isolate and therefore, we could not visit estates or the office. In addition to that there would be a risk that members of staff could fall seriously ill with the virus. To mitigate this the return to the office should be phased and all 7 members of staff should not be in the office together.
Office Cohesion		If it transpires that a member of staff contracts the virus and spreads it to others in the office and in turn they spread it to a family member who fall seriously ill or dies from the virus it would likely lead to a breakdown of cohesion among CIML staff, creating feelings of guilt and resentment between staff. Staff should continue to work from home if they have concerns around the risk of contracting and passing on COVID-19 to vulnerable family members.