

<b>Assessment of</b>	<b>Risks associated with COVID-19</b>	<b>Date</b>	<b>24 August 2020</b>
<b>Location</b>	<b>All operations within the Marston Holdings Limited group of companies.</b>	<b>No. of pages</b>	<b>7 (seven)</b>

<b>The Hazard</b>	
<b>Description</b> <ul style="list-style-type: none"> <li>Which situation could lead to harm</li> </ul>	<b>Infection Control – inward transmission</b> The potential for employees and others working on behalf of Marston Holdings Limited (MHL) to contract COVID-19 infection from colleagues, customers and members of the public.
<b>Contributing factors</b> <ul style="list-style-type: none"> <li>Information affecting the assessment</li> </ul>	<ul style="list-style-type: none"> <li>COVID-19 is a global respiratory pandemic, transmitted and contracted by means of breathing in contaminated air (including breath, coughs etc), and by touching the face (particularly mouth, nose and eyes) with the hands after previously touching an infected surface.</li> <li>The COVID-19 virus can live on some smooth hard surfaces for up to 72 hours, but on other softer or more textured surfaces, only survives for a much shorter time.</li> <li>The virus is destroyed by contact with soap and water, or with hand sanitiser of more than 60% alcohol content. It is also killed by exposure to UV-C light.</li> <li>The COVID-19 virus is less stable and not known to survive for long periods in an outdoor environment. It is readily dispersed outside, significantly reducing risks of transmission.</li> <li>MHL is a large outsourcing provider, delivering services on behalf of both central and local governments, the judiciary and commercial clients.</li> <li>MHL operations are extremely diverse in the type of services that are provided to clients, and in the way that these are delivered.</li> <li>MHL undertakes operations in England, Scotland and Northern Ireland, in both urban and rural environments.</li> <li>Front line services, back-office services and their support functions are undertaken from fixed sites, remotely via contact centres and on a mobile basis at customers' homes, business premises or in public environments.</li> </ul>
<b>Potential consequences</b> <ul style="list-style-type: none"> <li>What would be the likely severity</li> </ul>	Approximately 78% of people contracting COVID-19 will be asymptomatic* and will experience no direct adverse effects. A further 17% will experience only mild symptoms*, with no long-term effects. Around 5% of individuals contracting COVID-19 will become seriously ill* and may develop pneumonia or an over-exaggerated autoimmune response, requiring hospital admittance, potentially treatment in ICU (Intensive Care Unit) and in some cases, death. In all cases, there is the potential for anyone with COVID-19 to pass the infection to others, whether or not they have symptoms, potentially leading to serious illness or in extreme cases, death. * source British Medical Journal
<b>Who is at risk</b> <ul style="list-style-type: none"> <li>Who could be affected</li> </ul>	Employees and self-employed contractors are primarily at risk, but anyone that they would subsequently encounter could also be affected (see Infection Control – outward transmission). Clinically vulnerable individuals in particular are at moderate risk, including those 70 years of age and above and anyone with a significant underlying health condition. ** Clinically extremely vulnerable individuals are at high risk. ** ** source NHS.UK <a href="https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/">https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/</a>

<b>Current Situation</b>	
<p><b>Control measures already in place</b></p> <ul style="list-style-type: none"> <li>• This Corporate Risk Assessment must be considered in conjunction with the relevant operational and site-specific risk assessments to apply bespoke control measures to every workplace and job role.</li> <li>• All employees that can work from home have been facilitated to do so.</li> <li>• All appropriate non-essential employees have been placed on furlough leave.</li> <li>• Enforcement visits to residential properties were suspended on 24<sup>th</sup> March 2020. ***</li> <li>• Enhanced cleaning regimes have been introduced at all MHL sites.</li> <li>• Additional handwashing supplies have been provided, with special provision made for remote or mobile workers.</li> <li>• Handwashing and social distancing guidance have been published and shared with all workplaces.</li> <li>• All reasonable steps have been taken to maintain a 2m social distance in all MHL workplaces. Where this is not possible a minimum 1m distance with additional mitigation is observed.</li> <li>• Suitable training and instruction for employees and managers on reducing the risks and identifying the symptoms of COVID-19 has been delivered to all employees and sub-contracted Enforcement Agents.</li> <li>• Where reasonably practicable, work processes have been amended to reduce the risks presented by COVID-19.</li> <li>• The Health and Safety Champion at every MHL workplace will complete daily and weekly COVID-19 checklists to monitor and maintain ongoing standards.</li> </ul> <p>*** See also final section of this risk assessment document – Infection control (resumption of enforcement visits)</p>	
<p><b>When considering the existing measures above, the risk is presently rated as;</b></p>	<p><b>MEDIUM</b></p>

<b>Additional controls required</b>		
<p>Working from top to bottom through the hierarchy of control measures below, describe any further measures (if any) that may be required to reduce the risk to an acceptable level. It may be appropriate to introduce more than one new measure.</p>		
Required control measure	Who by	When by
<p><u>Eliminate – can the hazard be eliminated?</u></p> <p>No, COVID-19 is likely to be present in the UK for the foreseeable future.</p>		
<p><u>Substitute – can the risk be reduced by using a less harmful method or procedure?</u></p> <p>No other potential methods are available, other than the measures already introduced that are described in the previous section.</p>		
<p><u>Separation – is it possible to move those at risk away from the hazard?</u></p> <p>No reasonably practicable measures over and above those already introduced are available.</p>		
<p><u>Procedural – are physical measures or organisational measures required?</u></p> <p>No reasonably practicable measures over and above those already introduced are available.</p>		
<p><u>Personal Protective Equipment – is specialised clothing or equipment appropriate?</u></p> <p>PPE is only necessary or effective in specific circumstances – see Infection control (resumption of enforcement visits).</p>		
<p><u>Other – including supervision, information and instruction.</u></p> <p>No other additional measures would be reasonably practicable.</p>		
<p><b>After the controls listed above have been implemented, the risk will be rated as;</b></p>		<p><b>MEDIUM</b></p>

<b>The Hazard</b>	
<p><b>Description</b></p> <ul style="list-style-type: none"> <li>Which situation could lead to harm</li> </ul>	<p><b>Infection Control – outward transmission</b></p> <p>The potential for colleagues to transmit COVID-19 infection to customers, members of the public, their families and those sharing their address.</p>
<p><b>Contributing factors</b></p> <ul style="list-style-type: none"> <li>Information affecting the assessment</li> </ul>	<ul style="list-style-type: none"> <li>COVID-19 is a global respiratory pandemic, transmitted and contracted by means of breathing in contaminated air (including breath, coughs etc), and by touching the face (particularly mouth, nose and eyes) with the hands after previously touching an infected surface.</li> <li>The COVID-19 virus can live on some smooth hard surfaces for up to 72 hours, but on other softer or more textured surfaces, only survives for a much shorter time.</li> <li>The virus is killed by contact with soap and water, or with hand sanitiser of more than 60% alcohol content. It is also killed by exposure to UV-C light.</li> <li>The COVID-19 virus is less stable and not known to survive for long periods in an outdoor environment. It is readily dispersed, significantly reducing risks of transmission.</li> <li>MHL is a large outsourcing provider, delivering services on behalf of both central and local governments, the judiciary and commercial clients.</li> <li>MHL operations are extremely diverse in the type of services that are provided to clients, and in the way that these are delivered.</li> <li>MHL undertakes operations in England, Scotland and Northern Ireland, in both urban and rural environments.</li> <li>Front line services, back-office services and their support functions are undertaken from fixed sites, remotely via contact centres and on a mobile basis at customers’ homes, business premises or in public environments.</li> </ul>
<p><b>Potential consequences</b></p> <ul style="list-style-type: none"> <li>What would be the likely severity</li> </ul>	<p>Approximately 78% of people contracting COVID-19 will be asymptomatic* and will experience no direct adverse effects.</p> <p>A further 17% will experience only mild symptoms*, with no long-term adverse effects.</p> <p>Around 5% of individuals contracting COVID-19 will become seriously ill* and may develop pneumonia or an over-exaggerated autoimmune response, requiring hospital admittance, potentially treatment in ICU (Intensive Care Unit) and in some cases, death.</p> <p>In all cases, there is the potential for anyone with COVID-19 to pass the infection to others, whether or not they have symptoms, potentially leading to serious illness or in extreme cases, death.</p> <p>* source British Medical Journal</p>
<p><b>Who is at risk</b></p> <ul style="list-style-type: none"> <li>Who could be affected</li> </ul>	<p>Anyone that an infected employee or self-employed contractor encounters could be affected, including their partners, families and cohabittees, customers, clients and members of the public.</p> <p>Clinically vulnerable individuals in particular are at moderate risk, including those 70 years of age and above and anyone with a significant underlying health condition. **</p> <p>Clinically extremely vulnerable individuals are at high risk. **</p> <p>** source NHS.UK</p> <p><a href="https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/">https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/</a></p>

Current Situation	
<p><b>Control measures already in place</b></p> <ul style="list-style-type: none"> <li>• This Corporate Risk Assessment must be considered in conjunction with the relevant operational and site-specific risk assessments to apply bespoke control measures to every workplace and job role.</li> <li>• All employees that can work from home have been facilitated to do so.</li> <li>• All appropriate non-essential employees have been placed on furlough leave.</li> <li>• Enforcement visits to residential properties were suspended on 24<sup>th</sup> March 2020. ***</li> <li>• Enhanced cleaning regimes have been introduced at all MHL sites.</li> <li>• Additional handwashing supplies have been provided, with special provision made for remote or mobile workers.</li> <li>• Handwashing and social distancing guidance have been published and shared with all workplaces.</li> <li>• All reasonable steps have been taken to maintain a 2m social distance in all MHL workplaces. Where this is not possible a minimum 1m distance with additional mitigation is observed.</li> <li>• Suitable training and instruction for employees and managers on reducing the risks and identifying the symptoms of COVID-19 has been delivered to all employees and sub-contracted Enforcement Agents.</li> <li>• Where reasonably practicable, work processes have been amended to reduce the risks presented by COVID-19.</li> <li>• The Health and Safety Champion at every MHL workplace will complete daily and weekly COVID-19 checklists to monitor and maintain ongoing standards.</li> <li>• Washable cloth face coverings have been provided to all field-based employees. Such face coverings have been recommended by the UK Government as offering limited benefit to anyone encountering the wearer, particularly if they have COVID-19 but are asymptomatic. ***</li> </ul> <p>*** See also final section of this risk assessment document – Infection control (resumption of enforcement visits)</p>	
<p><b>When considering the existing measures above, the risk is presently rated as;</b></p>	<p><b>LOW</b></p>

Additional controls required		
<p>Working from top to bottom through the hierarchy of control measures below, describe any further measures (if any) that may be required to reduce the risk to an acceptable level. It may be appropriate to introduce more than one new measure.</p>		
Required control measure	Who by	When by
<p><u>Eliminate – can the hazard be eliminated?</u></p> <p>No, COVID-19 is likely to be present in the UK for the foreseeable future.</p>		
<p><u>Substitute – can the risk be reduced by using a less harmful method or procedure?</u></p> <p>No additional reasonably practicable measures are available.</p>		
<p><u>Separation – is it possible to move those at risk away from the hazard?</u></p> <p>No additional reasonably practicable measures are available.</p>		
<p><u>Procedural – are physical measures or organisational measures required?</u></p> <p>No additional reasonably practicable measures are available.</p>		
<p><u>Personal Protective Equipment – is specialised clothing or equipment appropriate?</u></p> <p>Additional PPE has been identified as necessary in the resumption of enforcement visits – see Infection control (resumption of enforcement visits).</p>		
<p><u>Other – including supervision, information and instruction.</u></p> <p>No additional reasonably practicable measures are available.</p>		
<p><b>After the controls listed above have been implemented, the risk will be rated as;</b></p>	<p><b>LOW</b></p>	

<b>The Hazard</b>	
<p><b>Description</b></p> <ul style="list-style-type: none"> <li>Which situation could lead to harm</li> </ul>	<p><b>Infection Control – resumption of enforcement visits</b></p> <p>The restarting of enforcement visits by Enforcement Agents to residential properties that have been suspended since 24<sup>th</sup> March 2020.</p>
<p><b>Contributing factors</b></p> <ul style="list-style-type: none"> <li>Information affecting the assessment</li> </ul>	<ul style="list-style-type: none"> <li>COVID-19 is a global respiratory pandemic, transmitted and contracted by means of breathing in contaminated air (including breath, coughs etc), and by touching the face (particularly mouth, nose and eyes) with the hands after previously touching an infected surface.</li> <li>The COVID-19 virus can live on some smooth hard surfaces for up to 72 hours, but on other softer or more textured surfaces, only survives for a much shorter time.</li> <li>The virus is killed by contact with soap and water, or with hand sanitiser of more than 60% alcohol content. It is also killed by exposure to UV-C light.</li> <li>The COVID-19 virus is less stable and not known to survive for long periods in an outdoor environment. It is readily dispersed, significantly reducing risks of transmission.</li> <li>MHL is a large outsourcing provider, delivering services on behalf of both central and local governments, the judiciary and commercial clients.</li> <li>MHL operations are extremely diverse in the type of services that are provided to clients, and in the way that these are delivered.</li> <li>MHL undertakes operations in England, Scotland and Northern Ireland, in both urban and rural environments.</li> <li>Front line services, back-office services and their support functions are undertaken from fixed sites, remotely via contact centres and on a mobile basis at customers’ homes, business premises or in public environments.</li> <li>The number of new infections and the number of people hospitalised has significantly reduced since the peak of the pandemic.</li> <li>Enforcement Agents are field-based and do not frequently visit MHL offices.</li> </ul>
<p><b>Potential consequences</b></p> <ul style="list-style-type: none"> <li>What would be the likely severity</li> </ul>	<p>Approximately 78% of people contracting COVID-19 will be asymptomatic* and will experience no direct adverse effects.</p> <p>A further 17% will experience only mild symptoms*, with no long-term adverse effects.</p> <p>Around 5% of individuals contracting COVID-19 will become seriously ill* and may develop pneumonia or an over-exaggerated autoimmune response, requiring hospital admittance, potentially treatment in ICU (Intensive Care Unit) and in some cases, death.</p> <p>In all cases, there is the potential for anyone with COVID-19 to pass the infection to others, whether or not they have symptoms, potentially leading to serious illness or in extreme cases, death.</p> <p>* source British Medical Journal</p>
<p><b>Who is at risk</b></p> <ul style="list-style-type: none"> <li>Who could be affected</li> </ul>	<p>Anyone becoming infected, including employees and self-employed contractors, their partners, families and cohabittees, customers, clients and members of the public.</p> <p>Clinically vulnerable individuals in particular are at moderate risk, including those 70 years of age and above and anyone with a significant underlying health condition. **</p> <p>Clinically extremely vulnerable individuals are at high risk. **</p> <p>** source NHS.UK</p> <p><a href="https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/">https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk-from-coronavirus/whos-at-higher-risk-from-coronavirus/</a></p>

<b>Current Situation</b>	
<p><b>Control measures already in place</b></p> <ul style="list-style-type: none"> <li>• This Corporate Risk Assessment must be considered in conjunction with the relevant operational and site-specific risk assessments to apply bespoke control measures to every workplace and job role.</li> <li>• Most interaction between Enforcement Agents and MHL, including the allocation of cases and other day-to-day communications is usually electronic or via telephone.</li> <li>• Suitable training and instruction for employees and managers on reducing the risks and identifying the symptoms of COVID-19 has been delivered to all employees and sub-contracted Enforcement Agents.</li> <li>• All Enforcement Agents have been provided with their own stocks of disposable gloves, which must be worn during any visits to a customer's address, or any other face-to-face interaction with a customer.</li> <li>• Hand sanitiser of more than 60% alcohol content has been provided to every Enforcement Agent to be used before and after every visit to a customer's address and any other time that they enter their vehicle.</li> <li>• Washable cloth face coverings are worn by Enforcement Agents. Such face coverings have been recommended by the UK Government as offering limited benefit to anyone encountering the wearer, particularly if they have COVID-19 but are asymptomatic.</li> </ul>	
<p><b>When considering the existing measures above, the risk is presently rated as;</b></p>	<p><b>LOW</b></p>

<b>Additional controls required</b>		
<p>Working from top to bottom through the hierarchy of control measures below, describe any further measures (if any) that may be required to reduce the risk to an acceptable level. It may be appropriate to introduce more than one new measure.</p>		
Required control measure	Who by	When by
<p><u>Eliminate – can the hazard be eliminated?</u></p> <p>No, COVID-19 is likely to be present in the UK for the foreseeable future.</p>		
<p><u>Substitute – can the risk be reduced by using a less harmful method or procedure?</u></p> <p>Yes, for an initial period of 30 days (from the date of this assessment) all visits to customer addresses must;</p> <ol style="list-style-type: none"> <li>1. Only be undertaken following reasonable attempts by the Enforcement Agent (by letter, phone, SMS and/or email) to contact the customer prior to visiting'. This is to assess any risks to either party and to help ascertain if there is anyone at the address who is symptomatic, vulnerable to COVID infection or in isolation. If so, the visit should be delayed.</li> <li>2. Be conducted outside, at a distance no less than 2m.</li> <li>3. Only continue after a confirmation by the customer to the Enforcement Agent upon arrival that no one at the property is symptomatic, vulnerable to COVID infection or isolating.</li> <li>4. Be terminated if the customer is displaying COVID symptoms such as a persistent cough.</li> </ol>		
<p><u>Separation – is it possible to move those at risk away from the hazard?</u></p> <ol style="list-style-type: none"> <li>5. Correspondence or documentation should not be handed directly to a customer; it should be posted through their letterbox once they have re-entered their property.</li> </ol>		
<p><u>Procedural – are physical measures or organisational measures required?</u></p> <p>No reasonably practicable measures over and above those already introduced are available.</p>		

<p><u>Personal Protective Equipment – is specialised clothing or equipment appropriate?</u></p> <ol style="list-style-type: none"> <li>6. Disposable gloves must be worn by an Enforcement Agent when delivering any correspondence, when touching a customer’s door (including doorbell) or when hand applying / removing a wheel-clamp.</li> <li>7. Type IIR facemasks must be worn by Enforcement Agents during any time that they are inside a customer’s address****</li> <li>8. Suitable eye protection such as clear face shields or goggles must be worn by Enforcement Agents during any time that they are inside a customer’s address****</li> </ol> <p><u>Other – including supervision, information and instruction.</u></p> <p>No other additional measures would be reasonably practicable.</p> <p>**** Entrance into a customer property is not permitted any sooner than 30 days from the date of this risk assessment</p>		
<p><b>After the controls listed above have been implemented, the risk will be rated as;</b></p>	<p><b>LOW</b></p>	