1. This policy sets out Guinness' approach to mitigating risks associated with the Covid 19 pandemic in order that we can protect our employees, customers and communities in which we work. It applies to all our activities across the Guinness Partnership, Guinness Care and Guinness Property.

2. The policy is applicable to employees and contractors, all of whom we expect to follow this policy diligently.

3. We recognise that the COVID-19 pandemic and associated restrictions on our normal way of life can have impacts on the mental wellbeing of customers and employees. We are committed to providing a safe and healthy environment for customers and employees.

Policy objective

4. Our policy objective is to take proportionate actions to ensure our services and ways of working mitigate the risks that COVID-19 poses to our employees, customers and communities (as far as is within our control). In so doing, we will seek to strike an appropriate balance between the specific safety risks posed by COVID-19 and the wider safety and wellbeing risks which we also have a responsibility to mitigate.

5. This policy sets out our overall approach to doing this and will be supported by detailed procedures and operational guidance in relevant areas.

Background

6. The Health and Safety at Work Act 1974 places specific obligations on Guinness to take appropriate steps to protect our employees and those affected by our work. In addition, we also face a duty of care and a moral responsibility to take appropriate steps to protect customers, contractors and communities in which we work. This document sets out the actions required to meet these obligations.

7. All our employees should understand that as well as having the right to protection, they have a personal responsibility for their own safety and the safety of others. By following our policies, procedures, safe working practices and demonstrating our behaviours we can make appropriate and informed decisions. If employees ever have to deviate from our policies, procedures or safe working practices we expect them to consult their manager, record the reasons and be able to demonstrate that the decision considered health and safety, controlled risks to an acceptable level and was proportionate, fair and reasonable.

Risk assessment

8. Before any work activity commences, we will carry out a risk assessment where it has been identified that there could be a risk of infection or a risk of spread of infection. We will implement and monitor any control measures identified.

9. We will consult with employees and share the significant findings of risk assessments with them. We will keep records of these risk assessments. We will ensure that all risk factors affecting our employees are considered, including those related to covid-19. Our risk assessments will be designed to put in controls to reduce the risk as low as we can for everyone, taking into account for example, gender, ethnicity, age, pregnancy and underlying health conditions.

10. As a minimum our risk assessments will take into consideration the following risk factors:
    - Whether employees are in face to face contact with customers or others
    - Whether an employee can maintain an appropriate social distance at work, in line with government advice at that time
    - Whether the employee shares a work area or works in groups or pairs
    - How employees travel to and from work, and between work locations
    - How employees enter, move around and exit the buildings they are working in
    - Availability and use of PPE
    - Ability to maintain hand hygiene
    - Cleanliness of work area
    - The extent to which the work area is outside or (if inside) ventilated
    - Ability to avoid people with symptoms
    - Appropriateness of homeworking environment (if relevant)

11. As a minimum we will put in place the following control measures in our method statements and safe systems of work:

    - Visiting customers' homes for pre-arranged purposes only, wherever possible
    - Only carrying out emergency work in homes where we are aware that customers have symptoms or have tested positive for Covid-19, or when government guidelines require this, and with strict protocols to ensure social distancing
    - Varying times that employees travel to and from any workplace when using public transport
    - Promoting good respiratory hygiene (Catch it, bin it, kill it).
    - Providing access to hand hygiene facilities including hand sanitiser where handwashing facilities are not available
    - Encouraging employees to take only essential items to work
    - Ensuring an appropriate distance between colleagues and customers, the wearing of PPE, and remaining alert when in communal corridors and walkways
    - Using the stairs, avoiding using lifts where it is possible to do so and if not possible (i.e. due to manual handling or individual differences) avoiding using the lift at the same time as others
    - Not eating, drinking or smoking inside a residential property
    - Washing hands before and after each visit to a customer's home and before and after eating, drinking or smoking
    - Cleaning any tools, vehicles, premises or equipment
    - If PPE is identified as required, wearing, removing and disposing of it using the safe removal and disposal methods.
    - Ensuring that any offices which are available to employees are adapted and managed to ensure adherence with relevant government guidance

12. Prior to entering a customer's home, we will identify from an initial customer assessment process if any member of the household is displaying symptoms of COVID-19 and only carry out emergency work at this property with control measures identified by risk assessment.

13. We will provide instruction, training or information to employees on the control measures that are required for their work, whichever is most appropriate.

14. We will support people who areable to work at home to do so safely and reduce the risk to their physical and mental health.

PPE and face coverings

15. Through the risk assessment process, we will identify if any specific PPE is required for the protection of employees against COVID-19. We will purchase PPE that is to the required standard and will ensure there are suitable amounts of PPE available.

16. We will provide face coverings or face masks (as appropriate) for employees to wear in areas where there is a legal requirement to wear one (whichever relevant) and in other settings where there is a potentially increased risk. We will inform employees on how to use a face covering appropriately. We will encourage the use of face coverings in other settings.

17. We will encourage customers to use face coverings when in an enclosed space with a member of staff or contractor unless they are exempt under government guidance.

Cleaning and hygiene

18. All employees must maintain good standards of hand and respiratory hygiene while at work.

19. We will set standards of cleanliness in buildings we control and ensure that regular and efficient cleaning is undertaken to reduce the spread of infection. We will monitor and where required challenge standards of cleanliness.

20. We will provide suitable and sufficient equipment and materials for cleaning and waste disposal. We will ensure there are effective arrangements for the appropriate cleaning of equipment that is used.

21. We will monitor and where required challenge standards of cleanliness.

Symptomatic employees and contact tracing

22. Any employee who is infected will be required to self-isolate following the latest Government and HR guidelines. The employee must not return to work until they have followed a return to work process.

23. We will provide assistance to the National Health Service if we are required to support contact tracing.

24. We will provide QR codes at our offices, and other locations where it is mandatory to do so, to allow anyone who visits or uses the office to scan when they arrive.

25. We will enable employees to download the NHS contact tracing app on the phone that they are most likely to use all the time.

Shielding and underlying health conditions

26. We will follow any guidance from local or public health authorities with respect to the shielding of vulnerable groups.

27. Where an employee has an underlying health condition, we will take this into consideration and make appropriate reasonable adjustments in addition to the employee's activity risk assessment, if required. We will seek support and advice from our occupational health provider, if necessary.

Incidents

28. If at any time an employee observes or has concerns that rules are not being followed, their work should be stopped immediately, with the reason reported to their manager. All incidents must be reported as a near miss on theSHE assure system so it can be fully investigated, and any additional controls put in place.

29. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) require employers and self-employed people to report cases of COVID-19 which are linked with occupational exposure to specified hazards. We will therefore investigate any potential occupational exposures and report where it is found that there is an exposure. In practice, we would consider this to include cases where our method statements and safe methods of working had not been followed.

Maintenance and asset compliance

30. We will make every effort to carry out repairs, maintenance, building safety and asset compliance activities in line with our policies. Where we are unable to deliver these activities, we will risk assess each situation and make a record of the reasons why we are unable to continue.
31. Where necessary and appropriate, we will prioritise the delivery of services on a risk basis, for example by prioritising essential repairs and visits, and / or pausing non-essential repairs and visits.

Managing contractors

32. We will appoint competent contractors and seek assurance that they have carried out risk assessments and training prior to them starting work.

33. We will work with contractors to ensure they fulfil the requirements of their controls and will monitor the performance of our contractors to give ourselves assurance that they are working within their risk assessments and controls. We will challenge and investigate any inappropriate practice.

34. We will share good practice across our contractor base, recognising that this continues to be an evolving area and that we have a role to play in supporting our supply chain.

Homeworking

35. If an employee is working from home, we will provide them with training to do so safely and ask them to complete a working from home risk assessment so that appropriate control measures are implemented.

Government restrictions

36. We will monitor government guidance and announcements on lockdowns and other restrictions (for example, tiers) and where appropriate adjust our service delivery to ensure that government guidelines are followed.

Data and confidentiality

37. All private health and personal data will be treated with confidentiality and sensitivity and in line with the General Data Protection Regulations.

38. Anyone who works for the Guinness Group or on behalf of the Guinness Group must show those who are infected with COVID-19 the same consideration and respect as any other person who is not infected.

39. The Guinness Group expects everyone to act responsibly and without prejudice.

Declarations

40. For Registered Care Services, we will produce a weekly statement with regard to compliance with practice on infection prevention and cleanliness including COVID-19 and make it available to the CQC.

Period of review

41. Our review programme is driven by service improvement initiatives, changes to legislation, regulation, evolving good practice or feedback from customers and other key stakeholders. As this situation is changing rapidly, we will review this policy if there are any:
    - significant changes to the relevant legislation, guidance or standards
    - significant incidences of infection reported within teams
    - changes to the management systems used to help control infection

Key legal and regulatory references

- Health and Safety at Work etc. Act 1974
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- General Data Protection Regulations 2018
- Health and Social Care Act 2008

Related policies

- Health and Safety Policy
- Sickness Absence Policy
- Repairs policy
- Fire Safety Policy
- Asbestos Policy
- Gas policy
- Electrical policy
- Construction, Design and Management Policy

Version number	3.0
Policy approved by	Executive Team
Policy approval date	October 2020 (revised November 2020 and January 2021)
Policy effective from	January 2021
Policy review date	March 2021
Equality analysis approval date	July 2020
Policy author	Liz Skelton, Director of Health and Safety
Policy owner	Liz Skelton, Director of Health and Safety

Version history		
Version number	**Review trigger**	**Brief description of the main changes**
1.0	New policy	New policy.
2.0	Changes to government guidance	Inclusion of lockdown guidance and information on track and trace.
3.0	Cyclical	Change of statement on PPE provision to include risk-based decisions in addition to government mandates.

Annex 1: Definitions

Term	**Description**
Guinness or Guinness Group	Means The Guinness Partnership Limited and all of its subsidiary companies/ entities.
Risk Assessment	A document which identifies risks and controls and is used to develop an action plan or safe method of working
PPE	Personal protective equipment is designed to protect an employee from hazards. Where all other control measures are not available or cannot be effective PPE has been identified in the Management of Health and Safety at Work Regulations as the final control measure available.
Face coverings	Face coverings are not PPE. Face coverings are designed to protect others from the individual if they are symptomatic.