

CARE DATA SYSTEMS: COVID-19 RETURN-TO-WORK RISK ASSESSMENT



INTRODUCTION

We're relieved and reassured that the easing of Covid-19 lockdown measures means we can start talking to clients about delivering face-to-face training and consultation, once again.

Some clients, understandably, don't yet find themselves in a position where travel to us is possible. For others, the opposite is true.

This document is a short version of our full Covid-19 return-to-work risk assessment, which explains the measures we've put in place to help your income generation teams refocus on their donorflex skills and the well-being of your data at this crucial time.

- Note: The full version includes the risks assessed and measures taken in the parts of our Patrick House offices that visitors won't access. If you wish to see the full document, to gauge how we're keeping the rest of our area safe, please ask.

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LOCATIONS

- Patrick House, Lakeside Centre, Kings Norton, Birmingham
- Client premises
- Hotel premises
- Journeys to / from sites

SOCIAL-DISTANCING

Government guidelines say:

- Businesses and workplaces should make every reasonable effort to enable working from home as a first option
 - Working from home is CDS's first option, until further notice
- Where working from home is not possible, workplaces should make every reasonable effort to comply with the social-distancing guidelines set out by the Government (2m, or 1m with risk mitigation where 2m is not viable, is acceptable. You should consider and set out the mitigations you will introduce in your risk assessments)
- Where the social-distancing guidelines cannot be followed in full, in relation to a particular activity, businesses should consider whether that activity can be redesigned to maintain a 2m distance, or 1m with risk mitigations where 2m is not viable

HYGIENE

Government guidelines say:

- Where working from home is not possible, social-distancing guidelines should be supplemented with mitigating solutions that must be detailed in our return-to-work risk assessments
- Where the social-distancing guidelines cannot be followed in full, in relation to a particular activity, businesses should consider whether that activity can be redesigned to maintain a 2m distance, or 1m with risk mitigations where 2m is not viable

MITIGATIONS

- We will publish our risk assessment and mitigating procedures:
 - On the donorflex website (hyperlinked from our email signatures)
 - In any email correspondence that relates to a planned visit
- Display of information posters highlighting symptoms and risks of Covid-19 at entry points
- Symptomatic individuals will not be allowed entry. Please note:
 - Temperature checking will not be carried out; the current WHO position is that is not an effective way to stop spread
 - A more effective approach is to provide prominent prevention messages and to collect health declarations on arrival, with visitors' contact details, to allow for a proper risk assessment and possible contact-tracing
- Display information posters highlighting best practice in hygiene and distancing practices in designated locations within work areas
- Providing each staff member with their own PPE equipment for use at their workstation and off-site for client visits
- Further increasing the frequency of hand-sanitising and surface-cleaning

- Keeping the interaction time involved as short as possible
- Using screens or barriers to separate people from each other
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible
- Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others)
- Establishing a return-to-work staff rota system, as the lockdown eases, to enable a subset of staff to attend at pre-arranged times as an aid to social-distancing compliance
- Ensuring that staff workstations, including all computing equipment, cabling, telephone, chair, PPE equipment etc are dedicated to one staff member; no hot-desking permitted, and no touching of other staff workstations / equipment
- Use of shared devices – such printers, and the solid state machine, for example – should be kept to a minimum; use personal hand-sanitiser before and after use; avoid unnecessary printing, and immediately collect only your own output; ensure the devices / touch-points are cleansed after use
- Staff to bring own refreshments, including drinks, as access to outside / off-site facilities will not be permitted during the working day; use kitchen facilities in accordance with guidelines in this document

RISKS IDENTIFIED

- **VULNERABLE EMPLOYEES / EMPLOYEES IN CARING ROLES**
- **EMPLOYEE ACTIVITIES OUTSIDE WORKPLACE**
- **EMPLOYEE JOURNEY TO WORK**
- **ENTRY TO BUILDING AND WORK AREAS**
- **EXIT FROM BUILDING AND WORK AREAS**
- **THOROUGHFARE BETWEEN WORK AREAS**
- **SOCIAL-DISTANCING BETWEEN DESKS / EMPLOYEES**
- **SOCIAL-DISTANCING IN MEETINGS**
- **COMPLIANCE WITH COVID-19 HYGIENE REGIMES – PERSONAL & WORKSPACES**
- **CLIENT VISITORS TO CDS TRAINING FACILITIES**
- **SCHEDULED VISITORS TO OFFICES (ACCOUNTANT, BOOK-KEEPER, ESSENTIAL MAINTENANCE PERSONNEL etc)**
- **AD-HOC VISITORS TO OFFICES (SITE MANAGER, DELIVERIES etc)**
- **EMPLOYEE TRAVEL TO / FROM CLIENT SITES**
- **EMPLOYEE ATTENDANCE AT CLIENT SITE MEETINGS**
- **EMPLOYEE OVERNIGHT STAYS FOR CLIENT SITE MEETINGS**
- **AVAILABILITY OF COVID-19 PPE**
- **KEEPING UP WITH GOVERNMENT GUIDANCE / OFFICIAL SOURCES OF INFORMATION / REVIEW RISKS ON FREQUENT BASIS**
- **COVID-19 ILLNESS WITHIN THE WORKPLACE**

- **COVID-19 ILLNESS WITHIN THE WORKFORCE**

AD-HOC AND SCHEDULED VISITORS TO PATRICK HOUSE

Ad-hoc deliveries to the offices will be kept to an absolute minimum.

Scheduled visitors and essential maintenance engineers (for example Site Manager, IT Systems Support Engineer, Accountants, Bookkeeper, Air Conditioner Maintenance Engineer, Fire Extinguisher Maintenance Engineer) will be permitted entry by appointment only, will be required to wear a mask and will be accompanied throughout the visit.

They will be required to follow our COVID-19 social distancing and hygiene guidelines.

CDS host to take names, addresses etc for track and trace purposes; these will be retained for 21 days in accordance with NHS Test and Trace requirements (see [Appendix 1](#))

Personal deliveries to Patrick House will not be permitted for the foreseeable future.

Items of post brought to office by the site manager will be left in Reception, to be collected by nominated person only. All envelopes disposed of in wastepaper sack and hands sanitised.

Location	Risk	Mitigation
Reception	Security keypad	Main entrance door keypad, door handles and touch-points to be cleaned frequently between arrivals and deliveries
	Social-distancing	Maintain 2m distancing at all times; only authorised employees / visitors to be allowed access
	Hygiene	Hand-sanitiser to be used before moving past reception

CLIENT VISITORS TO PATRICK HOUSE

If an overnight stay cannot be avoided, we require the client to show evidence of the hotel organisation's risk assessments and mitigating procedures governing the stay at and use of facilities.

- We will offer the client a list of approved hotels known by CDS to have the appropriate Covid-19 risk assessment in place, if required
- Visitors will be asked to bring their own refreshments, including drinks; bottled water will be available for those who require it; bottles must be taken off-site by the visitor, or placed in the waste bag provided
- The number of clients being trained will be restricted to a maximum of five, to comply with the first-floor training room layout that has been arranged within social-distancing guidelines

FIRST-FLOOR TRAINING FACILITY

Location	Risk	Mitigation
Journey to Patrick House	Social-distancing	If client journey to CDS offices involves the use of public transport, the visitor must inform CDS representative beforehand; we will advise that face masks should be worn for the duration of the journey and that masks, coats etc should be left in boxes provided in Reception area; boxes will be sanitised before and after use
Reception	Security keypad	Main entrance door keypad, door handles and touch-points to be cleaned frequently between arrivals and deliveries
	Social-distancing	Maintain 2m distancing at all times; only authorised employees / visitors to be allowed access
	Hygiene	Hand-sanitiser to be used before moving beyond reception area
Stairs, Landing, Entrance, Corridor	Security keypad	Entrance ONLY. Entrance door keypad, door handles and touch-points to be cleaned frequently between arrivals
	Social-distancing	One-way operation for entry to / exit from training facility; maintain 2m distance at all times; comply with on-floor distance markings
	Hygiene	Hand-sanitiser to be used before moving beyond corridor area and upon entry / exit from toilets
	Thoroughfare	Access to offices, toilets and rear exit; maintain 2m distancing at all times; comply with on-floor distance markings
Training Room	Entrance / exit doors:	Two doors, one-way in-out system in operation, clearly marked
	Host guidance:	CDS host to take names, addresses etc for track and trace purposes; these will be retained for 21 days in accordance with NHS Test and Trace requirements (see Appendix 1)
	Social-distancing	Maintain 2m distance at all times
	Work areas	Will be cleaned before arrival; use hygiene products provided to keep personal work area, equipment and touch-points clean at all times and before leaving;

		personal waste to be placed in waste bags provided and left at your workstation for transport off site for disposal
Corridor facilities	Social-distancing	One person at a time in corridor; if not possible maintain 2m distancing at all times; comply with on-floor distance markings
	Toilet areas	One person at a time in toilet area; knock before entry to check availability and, if in use, return to your workstation and try again later; use of hand-sanitiser before entry; wash hands and dry thoroughly before exit; dispose of paper hand towels in bin provided; door handles and touch-points to be cleaned frequently between use
Exit stairs	Social-distancing	Exit ONLY; maintain 2m distancing at all times; CDS host will guide to exit
Rear exit	Social-distancing	Exit ONLY; one person in the rear exit lobby at a time; door handles and touch-points to be cleaned frequently between use

CDS VISITS TO CLIENT PREMISES

The guidelines associated with CDS staff visiting client premises are:

- Before we agree any visit to a client premises, we will require clients to provide evidence of the organisation’s risk assessments and mitigating procedures that govern our attendance at and use of their facilities
 - This will include reassurances that all client staff who will come into contact with CDS staff are well, and do not display any Covid-19 symptoms
- If a CDS staff member is unhappy with the environment in any way, they have full authorisation to leave the premises and return to base
- If overnight stays cannot be avoided, we will organise accommodation at the closest available Premier Inn facility, as PI has good nationwide coverage and has published an acceptable Covid-19 policy that applies to all its locations (see [Appendix 2](#))
- Only essential travel will be permitted and procedures for approving travel will be tightened and require prior authorisation
- Travel plans will be monitored, and procedures will be introduced regarding notification of employee location for the duration of the journey / visit
- The CDS employee undertaking the client visit will ascertain what risk assessments the client will need to see (CDS and / or Hotel, for example) before the visit takes place
- We will maintain a centralised electronic log of staff visits to client premises (including details of travel and overnight stays) in order to be able to manage potential track-and-trace information requests more easily

- Employees who have had Covid-19 symptoms (high temperature, continuous dry cough, a loss of, or change to, sense of smell and taste, rash etc) in the previous 14 days will be instructed to follow Government guidelines and self-isolate and not come into the workplace nor attend client sites
- Employees should carry the PPE provided by CDS – face masks, hand-sanitising gel, hygiene products – in order to maintain safety and clean their personal equipment in the client offices at the start and end of the session
- Employees should take their own refreshments, including drinks

Location	Risk	Mitigation
Journey to Client Site / Hotel	Social-distancing	If journey to client site involves the use of public transport, the visitor must inform the client representative beforehand
Hotel Reception, Lifts Corridors, Refreshment areas, Bedrooms	Social-distancing	<p>The preferred CDS hotel is Premier Inn (see Appendix 2). In the event that a Premier Inn hotel is not available, the hotel organisation should demonstrate that they have adapted their procedures to ensure guest safety in the Covid-19 era, such as:</p> <ul style="list-style-type: none"> • Clear displays of social-distancing signage throughout the hotel and regular temperature checks • Use of screens at reception desks to minimise cross-contamination • Minimise interaction and maintain social-distancing in refreshment service areas, in accordance with current food safety recommendations • Offer pre-packaged meals and provide private spaces for food consumption
	Hygiene	<ul style="list-style-type: none"> • Frequent sanitising of public areas, including reception, meeting rooms, lifts, door handles, keypads and public bathrooms • Availability of hand-sanitisers throughout the hotel and in all public toilets, reception areas, and in the refreshment service areas • Regular deep-cleaning of carpets and upholstery in public areas and bedrooms

		<ul style="list-style-type: none"> • Deep-cleaning of bedrooms between guest stays to Covid-19 standards • Use of PPE such as facemasks, gloves, and aprons, where necessary • Full training for hotel staff to ensure that the high standards of cleanliness required by Covid-19 guidelines are met
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APPENDIX 1

Visitor information to collect

The [Government Covid-19 website](#) advises that the following information will be collected by the organisation, where possible:

Staff

- The names of staff who work at the premises
- A contact phone number for each member of staff
- The dates and times that staff are at work

Clients and visitors

- The name of the client or visitor. If there is more than one person, then we can record the name of the 'lead member' of the group and the number of people in the group
- A contact phone number for each client or visitor, or for the lead member of a group of people
- Date of visit, arrival time and, where possible, departure time
- If a client will interact with only one member of staff, the name of the assigned staff member should be recorded alongside the name of the client

No additional data will be collected for this purpose.

We should collect this information in a way that is manageable for our organisation.

If not collected in advance, this information should be collected at the point that visitors enter the premises, or at the point of service if impractical to do so at the entrance.

It should be recorded digitally if possible, but a paper record is acceptable too.

Recording both arrival and departure times (or estimated departure times) will help reduce the number of clients or staff needing to be contacted by NHS Test and Trace. We recognise, however, that recording departure times will not always be practicable.

If someone does not wish to share their details, or provides incorrect information

Although this is voluntary, please encourage clients and visitors to share their details in order to support NHS Test and Trace and advise them that this information will only be used where necessary to help stop the spread of Covid-19.

If a client or visitor informs us that they do not want their details shared for the purposes of NHS Test and Trace, they can choose to opt out. If they do so, we should not share their information used for booking purposes with NHS Test and Trace.

The accuracy of the information provided will be the responsibility of the individual who provides it. We do not have to verify an individual's identity for NHS Test and Trace purposes.

How records should be maintained

To support NHS Test and Trace, records will be held for 21 days. This reflects the incubation period for Covid-19 (which can be up to 14 days) and an additional seven days to allow time for testing and tracing.

After 21 days, this information should be securely disposed of or deleted. When deleting or disposing of data, we must do so in a way that does not risk unintended access (for example, shredding paper documents and ensuring the permanent deletion of electronic files).

Records that are made and kept for other business purposes do not need to be disposed of after 21 days. The requirement to dispose of the data relates to a record that's created solely for the purpose of NHS Test and Trace. All collected data, however, must comply with the General Data Protection Regulation and should not be kept for longer than is necessary.

General Data Protection Regulation (GDPR)

The data we collect is personal data and must be handled in accordance with GDPR to protect the privacy of staff, clients and visitors. This section sets out the steps we can take to comply with GDPR. GDPR allows us to request contact information from staff, clients and visitors and share it with NHS Test and Trace, in order to help minimise the transmission of Covid-19 and support public health and safety.

It is not necessary to seek consent from each person, but we should make clear why the information is being collected and what we intend to do with it.

For example, if we already collect this information for ordinary business purposes, we should make staff, clients and visitors aware that their contact information may now also be shared with NHS Test and Trace.

We do not have to inform every client individually. We might, for example, display a notice at our premises or on our website setting out what the data will be used for and the circumstances in which it might be accessed by NHS Test and Trace.

We may need to offer some people additional support in accessing or understanding this information, for example, if they have a visual impairment or cannot read English.

Personal data that's collected for NHS Test and Trace – which we would not collect in our usual course of business – must be used only to share with NHS Test and Trace. It must not be used for other purposes, including marketing, profiling, analysis or other purposes unrelated to contact tracing, or we will be in breach of GDPR.

We must not misuse the data in a way that's misleading or could cause an unjustified negative impact on people – for example, to discriminate against groups of individuals.

Housekeeping

Unlike other hotel brands, we employ every single member of our 9,000-strong housekeeping team directly, meaning we're able to ensure they maintain the highest standards in cleanliness and hygiene training to the Premier Inn CleanProtect promise. We are also carrying out additional checks on rooms.

Bed linen and shower curtains

Laundering all our linen at over 60 degrees, with disinfectant detergent, so you can enjoy a safe and great night's sleep. We've also removed all extra pillows and we're replacing our shower curtains after every stay.

Protective equipment for our teams

To protect our team members, we've provided them with PPE equipment including gloves, aprons and hand-sanitiser. While there is no Government guidance on the need to wear face masks in a hotel setting, all our teams have been provided with face masks, empowering them with the choice if they wish to wear them.

DOCUMENT HISTORY

- CARE DATA SYSTEMS: COVID-19 RETURN-TO-WORK RISK ASSESSMENT DOCUMENT
- VERSION 1.1 (AUGUST 28, 2020)

Version	Amendment	Date
1.0	Initial document	July 31, 2020
1.1	Shortened version for clients (removes section on Patrick House safety procedures from this version)	August 28, 2020