

COVID-19 Risk Assessment

Company Name: EM Pharma

Date of Risk Assessment: 11 May 2020

What are the hazards?	Who might be harmed and how?	What are you already doing?	Do you need to do anything else to control this risk?	Action by who?	Action by when?	Done
Visitors attending EMP sites	Employees: in the event that visitors have COVID-19 and therefore an increased risk of transmission into EMP or amongst the workforce employees and beyond.	All visitors (with the exception of urgent visitors i.e. logistics service providers, workmen to maintain legislative H&S requirements or for critical building, plant or machinery repairs or to attend site in an emergency such as an Ambulance) are excluded from site. In the event of visitors attending site, signage is in the reception, a COVID-19 based questionnaire must be completed (and reviewed before permitting access) and hand sanitization must be used. A record of all visitors is maintained.	Continue to restrict and monitor any visitors attending site. Further consider: a. A site visitors diary or schedule for use by all and within which all visitors must be diarised to ensure only 1 visitor is on site at any one time b. Designate a single meeting room for visitor (meeting) use with additional hand sanitiser	Site Administration (and all EMP employees) Operations Manager to monitor	Immediate and Ongoing	17 March 2020
Managing Contractors attending EMP sites	Employees: in the event that contractors have COVID-19 and therefore an increased risk of transmission into EMP or amongst the workforce employees and beyond.	In the event of contractors attending site (and similarly to permitted visitors) COVID-19 signage is in reception, a COVID-19 based questionnaire must be completed (and reviewed before permitting access) and hand sanitization must be used. A record of all contractors is maintained.	Further review and consider: a. All contractors (specifically logistics service providers / drivers) should sign in at reception / a single point	Site Administration (and all EMP employees) Operations Manager to monitor	Immediate and Ongoing	17 March 2020 (*Visitors record previously in place)
Inter-site employee movements and work-related travel	Employees: if transferring between both geographically separated sites and if they have COVID-19 (transfers or exposes others to risk of infection).	The transfer of employees (people) between both of the Old Dalby and the Ilkeston site has been stopped in the exception of only key critical requirements to attend and which would otherwise result in a high risk of business disruption. Work-related (overseas) travel (nationally and internationally) has ceased.	Continue to restrict and monitor Further review and consider: a. If even key / business critical requirements can be removed by way of remote working i.e. all movement to cease	Operations Manager Managing Director to monitor	Immediate and Ongoing	10 March 2020

Hand-Washing and Hygiene	<p>Medical guidance (PHE, WHO) has outlined that a preventative measure is to frequently wash hands, maintain good hygiene and to avoid touching the face area.</p>	<p>Extra hand sanitization terminals have been mounted around site (including access and egress points).</p> <p>Upgraded signage has been placed through the sites (based on WHO guidance) and further sterilizing products have been deployed internally.</p> <p>Employees are reminded frequently to maintain good hygiene practice and cleanliness.</p>	<p>PPE (specifically face coverings / masks and gloves) are being explored.</p> <p>However "Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings" (Pg23 Guidance doc.)</p> <p>a. <i>*Additional PPE only to be deployed in Sterile manufacturing at Ilkeston and for the purposes of enhancing existing and providing an additional preventative control / barrier.</i></p>	<p>All employees</p> <p>Administration to monitor (and manage supplies / replen.)</p> <p>General Manager (Ilkeston) to action</p> <p>Site Hygiene Lead to monitor</p>	<p>Immediate and Ongoing</p> <p>ASAP</p>	<p>17 March 2020</p> <p>TBC</p>
Site Hygiene (Surface Cleaning & Housekeeping)	<p>Employees: Inadequate surface cleaning or cleaning not utilizing appropriate sporicidal / sterilizing products can present a risk of transfer or transmission of COVID-19.</p>	<p>Robust cleaning, sanitization and cleaning processes and timetable already exists due to current quality or regulatory requirements.</p> <p>Further to this, high contact surface / points (i.e. door handles, push plates, and busy common areas & surfaces such as tables, desks) are being more frequently cleaned.</p>	<p>Further review and consider:</p> <p>a. Additional servicing and filter changes to site A/C units</p> <p>b. <i>*Enhanced cleaning and maintenance of production (BR1-3) A/C units to be undertaken</i></p> <p>c. An end of day (or start of day) cleanliness checklist and sign off (process) to confirm that work is ready to recommence the following working day</p> <p>d. <i>*Enhanced cleaning check / sign-off sheets for common and operational areas to be developed and implemented</i></p> <p>e. Additional waste collections for the business</p> <p>f. Ongoing requirements for "multi-user" plant or equipment (i.e. FLT's)</p>	<p>Site Hygiene Lead to undertake and complete</p> <p>Maintenance Engineer</p> <p>Operational Quality Assurance Inspector to monitor</p> <p>Quality Manager and Site Hygiene Lead</p>	<p>Immediate and Ongoing</p> <p>ASAP</p> <p>ASAP</p>	<p>17 March 2020</p> <p>TBC</p> <p>TBC</p>

<p>Workplace congestion (inadequate or insufficient Social Distancing):</p> <p>Office (Including: meeting rooms)</p>	<p>Employees: Office space specifically at the primary business site in Old Dalby is approx. 2,000ft² (185m²) the Ilkeston site has a very small office area.</p> <p>If over congested and employees are not able to socially distance, this presents an enhanced risk of transfer of COVID-19.</p>	<p>In line with enhanced cleaning protocols (above) the office space has been diluted – to support ‘social distancing’ by way of:</p> <ol style="list-style-type: none"> 1. Those who can work from home, are doing so and are not attending the office 2. Those who have some ability to work from home (i.e. Operational roles but in possession of IT equipment) are also working from home more than would be usual 3. Additional equipment and software has been purchased to facilitate more people working from home (as above) 4. Alternate desks (leaving ‘gaps’ of desks) are being used to separate those in the office 5. Occupied desks in use wherever possible are either back to back or side to side and not face to face 6. Meetings are staged remotely wherever possible or with minimum no. of employees where attendance is required 7. Office based employees in the work place are working flexibly (i.e. earlier starts and finishes) to minimize employees in the office space 	<p>Consider physical re-design of office: remove furniture and re-augment layout to ensure that desks are physically spaced out and separated by a minimum 2m gap.</p> <p>Further consider or review opportunities for:</p> <ol style="list-style-type: none"> a. More entry / exit points to the office b. One-way flow around the office c. Alternative methods of Production > Office contact and communications instead of F2F <p><i>*Contactless invoice transfer (holding box) to be implemented</i></p>	<p>All office based employees</p> <p>Managing Director to monitor</p> <p>Warehouse Manager & Maintenance Engineer</p>	<p>Immediate and Ongoing</p> <p>ASAP</p>	<p>23 March 2020</p> <p>TBC</p>
--	---	---	--	---	--	--

<p>Workplace Congestion (inadequate or insufficient Social Distancing):</p> <p><u>Common Areas</u></p> <p>(Including: Canteen, Kitchen, Smoking Area, Toilets, Reception and Store Rooms)</p>	<p>Employees: Common areas at the primary business site in Old Dalby is approx. 380ft² (35m²) for the canteen plus other small areas.</p> <p>The Ilkeston site has the same array of common areas albeit in some cases fewer or less sizeable in surface area.</p> <p>If over congested and employees are not able to socially distance, this presents an enhanced risk of transfer of COVID-19.</p>	<p>In line with enhanced cleaning protocols (above) these common spaces have been diluted – to support ‘social distancing’ by way of:</p> <ol style="list-style-type: none"> 1. Canteen: Occupancy reduced to a maximum of 8 people 2. Interior (tables and seats) have been reconfigured 3. Signage mounted to confirm the above and to reiterate the need to maintain social distancing 4. Floor markings (staff access / egress door) to visually confirming a 2m distance 5. Breaks have been staggered and spread over a large duration of the day 6. Use of outdoor areas are encouraged to be used during breaks 	<p>Continually monitor and assess individual circumstances and should there be a change to individuals protected characteristics, reasonable adjustments will be considered and put in place.</p> <p>Further review opportunities for:</p> <ol style="list-style-type: none"> a. More entry / exit points to the building b. One-way flows <i>*to be implemented: “IN” adjacent to office wall and “OUT” into the locker area</i> c. ‘Contactless’ time and attendance management i.e. fobs or cards to be explored d. <i>*Additional ‘hand cleansing’ signage (after eating) to be posted in canteen</i> e. <i>*Additional table being obtained for canteen</i> f. <i>*Signage (2m social distancing) to be applied to smoking area</i> g. Floor demarcation being explored with a view to putting in place 	<p>All employees</p> <p>Production Planning Manager (Old Dalby) and General Manager (Ilkeston) to oversee day to day conformance</p> <p>Maintenance Engineer</p> <p>Maintenance Engineer</p> <p>Maintenance Engineer</p> <p>Maintenance Engineer</p> <p>Operations Manager to continually review in terms of effectiveness, changes or improvements</p> <p>Managing Director to monitor</p>	<p>Immediate and Ongoing</p> <p>ASAP</p> <p>ASAP</p> <p>ASAP</p> <p>ASAP</p>	<p>23 March 2020</p> <p>TBC</p> <p>TBC</p> <p>TBC</p> <p>TBC</p>
--	--	---	---	---	--	--

<p>Workplace Congestion (Inadequate or insufficient Social Distancing):</p> <p>Operations</p> <p>Including: Production (Sterile and Non-Sterile Manufacturing at both sites) Warehousing, Logistics and all other operational areas</p>	<p>Employees: Operational space at the primary business site in Old Dalby is approx. 70,000ft² (6,500m²) and at the Ilkeston site is approx. 20,000ft² (1,800m²).</p> <p>If over congested and employees are unable to socially distance, this presents an enhanced risk of transfer of COVID-19.</p>	<p>In line with enhanced cleaning protocols (above) the office space has been diluted – to support ‘social distancing’ by way of:</p> <ol style="list-style-type: none"> 1. Additional operational team members provided by either EMP colleague redeployment (offices based into the operation) have been returned to their roles and no or minimal agency are being used to minimal numbers in the operational workplace 2. Employee’s have been social distanced where possible by way of reducing the number of people in work areas. 3. In areas where social distancing cannot be followed in relation to a particular activity or is difficult to fully conform to, mitigating steps / actions will be taken should the activity need to continue. These steps / actions include: <ol style="list-style-type: none"> i. Keeping the time as short as is possible ii. Enhanced surface cleaning 4. Semi-fixed permanent working teams / groups already in place as far as is possible (due to part-time workers needing to be backfilled in) 	<p>Continually monitor and assess individual circumstances and should there be a change to individuals protected characteristics, reasonable adjustments will be considered and put in place.</p> <p>For (3) and specifically the sterile manufacturing area at Ilkeston, a review of PPE should be taken (and obtained as needed).</p> <p>Further consider and review opportunities for:</p> <ol style="list-style-type: none"> a. Staggered start and finish times <i>*50% of employees shift-start times to be flexed forward (15minutes)</i> b. One-way flows c. Increase number of radios (for communication and reduce movement of people around site(s)) d. Reduced job and equipment rotation e. Further opportunities to “Workgroup” buddying or “fixing” in to non-changeable groups so that employee’s are always working with the same peers 	<p>All office based employees</p> <p>Production Planning Manager (Old Dalby) and General Manager (Ilkeston) to oversee day to day conformance</p> <p>Production Planning Manager & General Manager (Ilkeston) and Administration</p> <p>Operations Manager to continually review in terms of effectiveness, changes or improvements</p> <p>Managing Director to monitor</p>	<p>Immediate and Ongoing</p> <p>ASAP</p>	<p>23 March 2020</p> <p>TBC</p>
--	---	---	---	---	--	---------------------------------

<p>Increased Employee Stress, Anxiety , detrimental Mental Health or general health and wellbeing impact as a result of the COVID-19 pandemic</p>	<p>Employees: due to the ongoing evolution of the pandemic, colleagues might be experiencing increased levels of stress, anxiety, detrimental mental health or otherwise, a negative impact on their general health and wellbeing at this time.</p>	<p>To seek to assist during these challenging times, the following steps are being taken when appropriate:</p> <ol style="list-style-type: none"> 1. Increased communications (internally; Day Lewis, Managing Director, Line Managers / Supervisors / Other) *Refer to section* 2. Wi-Fi has been enhanced to continue to provide free to use and sufficient capacity for 'Staff access during breaks in order to access news or undertake any personal tasks that might be required with further flexibility on a case by case basis should they have additional personal needs 3. The EAP (Employee Assistance Program) remains available for all EMP Employees (FoC) 4. For those feeling that they are unable to attend the workplace due to anxiety, the company's enhanced sick pay benefit has been applied in line with the policy 5. Periods of sickness absence incurred by employee's directly related to COVID-19 are being 'discounted' in terms of company attendance management and / or disciplinary process(es) 	<p>Further review opportunities for additional support.</p> <p>Additional support leaflets / guidance that might be available.</p> <ol style="list-style-type: none"> a. <i>*Clarity (and business update / note) to be provided around annual holiday and specifically, current company approach in light of The Working Time (Coronavirus) (Amendment) Regulations 2020 which amends the Working Time Regulations 1998.</i> b. <i>*Creation of a COVID-19 notice board for both company specific and Gov. updates to be posted</i> 	<p>All employee</p> <p>Senior Managers / Line Managers to monitor operationally</p> <p>Operations Manager and Managing Director (update)</p> <p>Production Planning Manager & Maintenance Engineer</p> <p>Managing Director to monitor and oversee effectiveness</p>	<p>Immediate and Ongoing</p> <p>ASAP</p> <p>ASAP</p>	<p>12 May 2020</p> <p>TBC</p> <p>TBC</p>
--	---	---	--	--	--	--

<p>Clinically Extremely Vulnerable</p> <p>and</p> <p>Clinically Vulnerable</p> <p>Individuals (Employees) attending EMP workplaces</p>	<p>In order to protect clinically extremely vulnerable and clinically vulnerable members of society (and by virtue, some meeting those classifications are EMP employees) these individuals have been strongly advised to not go to work due to significantly greater risk of contracting COVID-19.</p>	<p>In line with the prevailing Gov, PHE and NHS guidance:</p> <ol style="list-style-type: none"> 1. Those employees meeting these criteria are remaining away from the workplace 2. Those employees meeting the criteria whom do not want to heed the advice and being actively managed and supported by offering the safest available on-site roles which involves workplace isolation, in an exclusively sole occupancy work area and maintaining a minimum 2m distance from other members of the team 	<p>Further review and consider:</p> <ol style="list-style-type: none"> a. Keeping in touch and providing ongoing business updates and communication b. Supporting those not in the business and any additional needs that they have c. Continue to monitor evolving Gov. PHE and NHS guidance on the timeframes and requirements in to the future 	<p>Employees (individuals within the defined categories)</p> <p>Line Manager(s) for ongoing support and communications</p> <p>Managing Director to oversee</p>	<p>23 March 2020 and Ongoing</p>	<p>23 March 2020</p>
<p>Communications and Training</p> <p>Poor communications proliferates incorrect business information and can have a detrimental impact as well as drive ambiguity or lack of understanding around COVID specific safety in the workplace / business</p>	<p>Employees: Misinformation specifically relating to the business can have a detrimental impact on many levels.</p> <p>Lack of or incorrect information relating to COVID-19 enhances the risk of individual non-conformance which in turn can result in enhanced risk of transmission etc.</p> <p>Further, this can be detrimental to mental health and employee wellbeing.</p>	<p>The business (both EMP and Day Lewis) provides clear, consistent and regular communication to all employees.</p> <p>The business engages with workers and seeks to obtain input and agreement on changes in or to working conditions.</p> <p>A cross-section of the business was engaged in the finalization of this RA. Pending MD approval, it will be further cascaded including the provision of hard copies and digital copies published (EMP website)</p>	<p>Further review and consider:</p> <ol style="list-style-type: none"> a. Increasing frequency of communications b. Explore extended use of visual communications / contactless method of communication i.e. briefing emails, memo's, notices or utilizing technology such as 'WhatsApp' c. Training (i.e. ILM3, ILM5 or 1st Aid (Ilkeston)) Can this be provided by distance learning / electronically / remotely d. <i>*BCP (Business Continuity Plan) and Emergency Contact details (employees) to be checked and updated</i> 	<p>Managing Director to outline and shape business requirements and provide updates by means that they deem best suited and most appropriate.</p> <p>Administration assistant</p>	<p>Immediate and Ongoing</p> <p>ASAP</p>	<p>23 March 2020</p> <p>TBC</p>

This risk assessment should be reviewed if you think it might no longer be valid (eg following an accident in the workplace or if there are any significant changes to hazards, such as new work equipment or work activities)