

Introduction:

Since the initial outbreak of COVID-19 in the UK, ABP has developed guidance on how to stay safe in the workplace and communicated this to our workforce. The guidance and communications have consistently reflected and aligned with Government guidelines to allow for the practical and necessary steps to prevent and limit the transmission of the COVID-19 virus within the workforce. This document further considers the Department for Business, Energy & Industrial Strategy's guidance to help employers understand how to work safely during the coronavirus pandemic and how we have implemented that guidance within ABP.

Purpose:

The purpose of this assessment is to ensure that the risks posed by COVID-19 to the health of our employees, contractors, visitors etc. across the business are assessed in a consistent and effective manner. The emphasis of this generic risk assessment being to consider and apply control measures to continue our objective of preventing the spread of COVID-19. It puts on record, the process by which ABP has continued to manage our workforce's exposure to COVID-19 since the beginning of the outbreak.

This document is not intended to and does not replace more detailed risk assessments and safe systems of work relating to our operations and sites.

Scope:

The scope of the document applies to all ABP sites and functions and is supported by our risk assessment and guidance for scenarios where social distancing cannot be maintained.

Principles:

The Government has, in collaboration with Public Health England (PHE), and other organisations including the Health and Safety Executive (HSE), assessed the risks in relation to COVID-19 exposure. As a result of that combined assessment, those bodies have identified the principal control measures required to prevent and minimise transmission of the COVID-19 virus in both public- and workplace settings. Our workforce, visitors etc. will be familiar with those measures so for that reason, ABP have adopted those same measures as a set of 'guiding principles' on which to base our own controls. Where appropriate, this will help 'smooth' the transition from a non-working, to a working environment. For Wales and Scotland refer to: Public Health Wales (PHW) and Public Health Scotland (PHS) respectively.

Methodology:

Due to the unique nature of this pandemic situation, the actual level of risk in any given work scenario is unknown. Also, new information and guidance appear and change on regular-, sometimes daily, basis. Taking these factors into account, we decided at an early stage that the quickest and most effective way of identifying and implementing control measures was to start off the process by first providing a set of 'Guiding principles'. Latterly, we introduced a checklist of 'Things to consider'.

By not being overly prescriptive, we allowed those responsible for identifying, implementing and managing control measures at a local level to be flexible in their approach. This enabled them to tailor control measures to suit their own particular and frequently, 'unique' set of circumstances e.g. staggered shift times and breaks. As a result, the process has proved to be an effective method of engaging with the workforce who have been instrumental in identifying, implementing and importantly, following, site-specific controls.

The over-arching philosophy is based on the well-established hierarchy of risk controls starting with elimination of the hazard e.g. working from home, through to the provision of personal protective equipment (PPE) as a control measure of last resort.

The 'Guiding principles' mentioned above are as follows:

- All our colleagues who can work from home are expected to do so and we will provide the equipment to allow them to do that;
- Handwashing facilities and/or sanitiser will be made available at each workplace or on personal issue for colleagues with no fixed workplace;
- Take all reasonable steps to maintain a minimum of 2 m separation between personnel.
- Where a 2 m separation between colleagues cannot be maintained, we will take all reasonable steps to minimise transmission of the virus from one person to another.
- Employees in the 'vulnerable' category will be assessed on a case by case basis, based upon medical advice.

Notwithstanding these five principles, we will always consider the impact or effect any COVID-related control measures may have on other risks associated with tasks e.g. team lifting to reduce manual handling risks.

The checklist of 'Things to consider' can be found in Appendix A. The checklist will be sent via cascade from Regional or Head Office Leadership Teams to their respective managers or a nominated responsible person at each location. Where operations have continued during the COVID situation, the manager/responsible person will use the checklist to cross-reference against the controls that are already in place. Where work has not yet recommenced, the manager/responsible person at each location will use the checklist to determine the appropriate control measures required to be in place prior to instructing colleagues to return to the workplace. When all necessary control measures are in place, the manager/responsible person will confirm that is the case to their respective leadership team.

Monitoring, audit and review of this process will be carried out as described in the appropriate sections below.

Communication:

For those control measures that are not immediately visible in the workplace e.g. screens, floor markings etc, we will use the following communication streams to ensure colleagues and visitors are made aware of the control measures in place on our sites:

- iPort;
- Toolbox talks and pre-shift briefs;
- Site inductions;
- Posters;
- On-site TV screens;
- E.mails;
- Letters to customers and direct mailing to colleague's home addresses;

Monitoring:

Until such time as a review deems it no longer appropriate, we will carry out the following monitoring activities:

- At a Regional level, ABP will maintain a daily record of all COVID-19 related absences and a weekly record across the business;
- A record will be maintained of stocks of personal protective equipment, soap, sanitiser and other equipment provided to be worn or applied to protect against COVID-19 infection and transmission;
- A record will be maintained for each business unit, port, depot, location, office, function etc. that the 'Things to consider' checklist has been completed. Regular assurance checks will be carried out by regional Health and Safety teams.

Audit:

COVID-19 related measures will be incorporated as a topic and covered in our existing audit plan visits.

Review:

Rather than stipulate a time-based revision period, a review of this risk assessment will be triggered when there is reason to suspect that it is no longer valid or there has been a significant change, for example:

- feedback from consultation with the workforce;
- localised changes to the threat of infection;
- national changes to the threat of infection;
- changes to the consequence of infection;
- relevant changes to Govt. guidance or legislation;
- any event (including inspections, audits etc.) that calls into question the validity, effectiveness or practicability of any of our existing control measures.

A record of reviews and revisions to this assessment will be kept in Appendix C.

Governance:

The Leadership Teams of each region will be accountable- and take responsibility for tracking and monitoring progress at a local level. ABP Exec. will have overall Governance across the Regions and Head Office.

Relevant legislation:

Health and Safety at Work etc. Act 1974

The Management of Health and Safety at Work Regulations 1999

The Personal Protective Equipment at Work Regulations 1992

The Workplace (Health, Safety and Welfare) Regulations 1992

The Health Protection (Coronavirus, Restrictions) (England) Regulations 2020

The Information and Consultation of Employees Regulations 2004

The Health and Safety (Consultation with Employees) Regulations 1996

The Safety Representatives and Safety Committee Regulations 1977

The main ("principal") Regulations are the Health Protection (Coronavirus Restrictions) (No 2) (Wales) Regulations 2020

Coronavirus Scotland Act 2020

APPENDIX A – Checklist of ‘Things to consider’

No	Subject	Status
Buildings:		
1.	A basic calculation has been undertaken for each building/office to ensure and allow for maintaining the 2-metre social distancing	<input type="checkbox"/>
2.	Kitchen areas are paid particular attention with the implementation of strict maximum numbers permitted at any one time to maintain social distancing	<input type="checkbox"/>
3.	Kitchen areas have strict regular cleaning regimes, including: fridges, worktops, dish clothes, tea towels, floors, etc	<input type="checkbox"/>
4.	Waste bins in rest rooms and kitchens have liners, sealed lids and are emptied regularly	<input type="checkbox"/>
5.	Rest areas are paid particular attention, these should be organised in a way that social distancing can be maintained, whether by rotation of breaks or providing additional separate facilities, such as, other rooms or temporary buildings/cabins	<input type="checkbox"/>
6.	Reception areas are reviewed to allow for social distancing, signage, floor-marking and screens should be provided where appropriate and practical to do so, hand sanitiser should also be made available (Visitors should be kept to an absolute minimum)	<input type="checkbox"/>
7.	Where practical to do so, one-way systems are used to support social distancing measures	<input type="checkbox"/>
8.	Passenger lifts should only be used by one person at a time to allow for social distancing	<input type="checkbox"/>
9.	Where there are individual offices, colleagues should be encouraged to consume their lunch within their office, thus easing congestion of communal areas, such as rest rooms or kitchens	<input type="checkbox"/>
10.	Water systems, showers, sink taps, water heaters should be run off to prevent potential for Legionella related issues arising, competent contractors should be engaged if in any doubt	<input type="checkbox"/>
11.	Where reinstating IT equipment, all cables must be kept secure and tidy to prevent potential tripping hazards	<input type="checkbox"/>
12.	Meeting rooms should be well ventilated with open windows where practical to do so and maximum persons per room should be established and communicated to allow for social distancing to be maintained	<input type="checkbox"/>
13.	Signage should be displayed at all entrances notifying all colleagues and visitors of the need to comply with social distancing	<input type="checkbox"/>
14.	Notices should be displayed on any external gatehouses and main office doors indicating access by pre- arranged appointment only	<input type="checkbox"/>
15.	Interaction at external and office weighbridge areas must be kept to a minimum, where practical windows should be kept closed and handling of paperwork eradicated or kept to an absolute minimum	<input type="checkbox"/>
Hygiene:		
1	Hand sanitisers should be provided at all entrances with notices to use before entry	<input type="checkbox"/>
2	Were applicable, wedge open internal doors to minimise the need for contact with door handles (fire doors should be considered)	<input type="checkbox"/>
3	Where necessary, cleaning contractors work should be extended to ensure regular cleaning of contact points to prevent potential contamination	<input type="checkbox"/>
4	Arrangements in place to clean toilets, showers and washrooms, provide soap and signs displayed reminding people to wash their hands regularly	<input type="checkbox"/>
5	Where practical anti-virus cleaning fluids should be available so colleagues can ensure regular additional cleaning where required	<input type="checkbox"/>

Vehicles and Plant:		
1	Wherever practical only one person should occupy company vehicles, (vans) where this is not possible, then maximum of two persons but maintaining distancing by using diagonal sitting positions from front to back seats	<input type="checkbox"/>
2	Vehicles and plant should be kept clean and where appropriate and required the interior and touch points regularly wiped down with antiviral wipes	<input type="checkbox"/>
3	Vehicles and plant should be parked, accessed and egressed in a manner that supports social distance.	<input type="checkbox"/>
Visitors and Contractors:		
1	All visitors and contractors should work within CoVID-19 guidelines to support the potential to minimise risk of spreading infection, the ports should be clear of who is visiting, when, what for and that they are aware of ABP controls	<input type="checkbox"/>
2	Contractors working on projects must comply with all health and safety regulations and observe the CoVID-19 social distancing requirements, visitors to developments must be kept to an absolute minimum	<input type="checkbox"/>
3	Ships agents and cargo surveys being asked to work from their cars but still being given access to WCs / facilities.	<input type="checkbox"/>
Personal Protective Equipment:		
1	The normal five-point PPE policy remains and applies to all employees	<input type="checkbox"/>
2	Where appropriate masks should be worn to prevent the potential for transfer of infection	<input type="checkbox"/>
Health and Wellness:		
1	If individuals start to feel unwell and appear to be showing signs of ill health, such as high temperature, coughing, loss of smell and or taste, then they must inform their line manager immediately	<input type="checkbox"/>
2	Individuals who become unwell at work and are showing symptoms of a temperature and/or constant cough should go home immediately and self-isolate, contact should be made with the Line Manager/HR to arrange for testing	<input type="checkbox"/>
3	If the individual becomes so unwell that they are unable to go home, then they should isolate in a suitable room and emergency medical support should be immediately requested	<input type="checkbox"/>
4	Once medical emergency services have arrived, then the manager should ensure their advice is followed	<input type="checkbox"/>
5	If the individual is classed as 'vulnerable', have they taken independent medical advice and can that advice be followed e.g. conducting their work whilst maintaining social distancing at all times	<input type="checkbox"/>
6	If an ABP employee reports a confirmed positive test for COVID and they have worked at or visited an operational ABP site, office within the two days prior to the onset of symptoms or positive test, they must not be allowed to return to their workplace until the necessary period of self-isolation has elapsed. If they are at work at the time of receipt of notification, they must be kept isolated until arrangements are made for their safe return home	<input type="checkbox"/>

Health and Wellness Continued		
7	The line manager must take all reasonably practicable steps to ensure that: anyone who may have come into contact with the individual at work are notified (keeping the identity of the individual anonymous where possible); and that any workplace, work equipment, vehicle etc. is taken out of use for 72 hours where practical to do so. Where this is not practical, then arrangements should be made for a thorough deep clean prior to further use or occupancy. Depending on the circumstances of each individual case, the line manger may wish take other additional precautionary measures, such as: arrange for the testing of ‘contacts’, creating a new ‘bubble’ etc.	<input type="checkbox"/>
8	If a worker not affected in the direct employment of ABP (or their employer) reports a confirmed positive test for CoVID-19, then the manager of the business unit in which that individual had worked must ensure that the remedial measures identified within point 7 take place, in so far as they apply to ABP property, equipment and notification of potential ABP contacts.	<input type="checkbox"/>
Communication		
1	Systems are in place to inform the workforce of the control measures and arrangements in place to control the risks from COVID-19 and prevent transmission of the virus.	<input type="checkbox"/>

Appendix B – Guiding Principles poster

Staying COVID-19 Secure in 2020

We confirm we have complied with the government's guidance on managing the risk of COVID-19

FIVE STEPS TO SAFER WORKING TOGETHER

- ✓ We have carried out a **COVID-19 risk assessment** and shared the results with the people who work here
- ✓ We have **cleaning, handwashing and hygiene procedures** in line with guidance
- ✓ We have taken all reasonable steps to **help people work from home**
- ✓ We have taken all reasonable steps to **maintain a 2m distance** in the workplace
- ✓ Where people cannot be 2m apart, we have done everything practical to **manage transmission risk**

Employer _____ Associated British Ports _____ Date _____

Who to contact: _____ Your Health and Safety Representative
(or the Health and Safety Executive at www.hse.gov.uk or 0300 003 1647)

Appendix C – Record of review and changes

Date	Summary of change	Reason
26/05/2020	<ul style="list-style-type: none"> • Amendment of guiding principles that addresses 'vulnerable' employees. • Amendment of checklist guidance that adds additional control measures for vulnerable employees • Amendment of sanitiser locality to entrances 	Changes made incorporate guidance received from recent Government recommendation