

COVID-19 Policy

This COVID-19 policy outlines our commitment as an employer to implement a COVID-19 response plan and help prevent the spread of the virus. The policy will be signed and dated by the managing partner and brought to the attention of our managers, supervisors, clients and workers.

COVID 19 Policy Statement

M J O Connor LLP Solicitors is committed to providing a safe and healthy workplace for all our workers and customers. To ensure that, we have developed the following COVID-19 Response Plan. All partners, contractors and staff are responsible for the implementation of this plan and a combined effort will help contain the spread of the virus. We will:

- continue to monitor our COVID-19 response and amend this plan in consultation with our workers
- provide up to date information to our workers on the Public Health advice issued by the HSE and Gov.ie
- display information on the signs and symptoms of COVID-19 and correct hand-washing techniques
- provide an adequate number of trained Worker Representative(s) who are easily identifiable and put in place a reporting system
- inform all workers of essential hygiene and respiratory etiquette and physical distancing requirements
- adapt the workplace to facilitate physical distancing
- keep a log of contact / group work to help with contact tracing
- have all workers attend an induction / familiarisation briefing
- develop a procedure to be followed in the event of someone showing symptoms of COVID-19 while at work or in the workplace
- provide instructions for workers to follow if they develop signs and symptoms of COVID-19 during work
- intensify cleaning in line with government advice

All partners, contractors and staff will be consulted on an ongoing basis and feedback is encouraged on any concerns, issues or suggestions.

This can be done through the Worker Representative - Valerie Martin vmartin@mjoc.ie

Signed:  _____

Date: 25 June 2020

Employer Information

Employer Name:	<i>M J O Connor LLP Solicitors</i>
Workplace Address:	<i>Rochestown, Drinagh, Co Wexford & Cobh, Co Cork</i>
Director / Senior Manager in the Workplace:	<i>Seamas Turner Brid O Leary John O Leary</i>
Worker Representative:	<i>Valerie Martin</i>
Type of Business:	<i>Legal Practice</i>
Number of Workers:	<i>12</i>
Number of Workers who Deal Directly with the Public:	<i>12</i>
Phone:	<i>053 9122555</i>
Email:	<i>info@mjoc.ie</i>

COVID 19 Response Plan

Introduction

The following document has been created by M J O Connor LLP Solicitors in order to provide our employees with information and guidance on the measures we have put in place to help prevent the spread of Covid-19 in our workplace. The information provided has been collected from the following sources.

www.gov.ie, www.hse.ie, www.hspsc.ie and www.hsa.ie

This is a living document and all plans and procedures will be updated in line with the latest developing information from these sources.

If you have any issues or concerns on any aspect of the following please contact the designated office COVID-19 response manager boleary@mjoc.ie or the COVID-19 worker representative vmartin@mjoc.ie

We welcome a collaborative approach to implementing these measures and will be happy to work in cooperation with our employees to ensure a continued safe and enjoyable environment to work.

Risk Groups

Coronavirus (COVID-19) can make anyone seriously ill. But for some people, the risk is higher.

HSE advises there are two groups of people at higher risk from Coronavirus. High Risk & Very High Risk. If you currently fall in to any of these categories or your circumstances change which put you into either of these categories in the future you must immediately make us aware of this.

Further details on what you should do if you fall into either of these categories can be found here <https://www2.hse.ie/conditions/coronavirus/people-at-higher-risk.html>

Working Arrangements

Since March 2020 M J O Connor has put in place the required means of working from home for all of our staff. This allowed employees to continue working whilst practicing social distancing and adhering to stay at home guidelines. Insofar as it remains practicable these measures will remain available to all employees where required going forward and can be discussed with partners to facilitate same.

If at any point, any adjustment to staff rosters, organising of teams, breaks etc is needed to reduce the number of people in the workplace at any one time and to maintain physical distancing we will liaise with employees to put this in place.

We will create a log of all on site employees each day for the purpose of maintaining a COVID-19 contact log in the workplace. You will not be required to sign in and out manually, this log will be maintained by the COVID-19 worker representative vmartin@mjoc.ie in connection with the existing method of recording holidays* and absences. Therefore you should always ensure to keep holidays and absences records up to date by communicating additions or amendments as necessary.

* if an employee has returned from holidays in an affected area a decision as to whether or not that employee should self-isolate will be taken in such circumstance based on the appropriate HSE advice/guidelines and/or medical advice at that time .

<https://healthservice.hse.ie/staff/news/news-items/staff-who-have-returned-from-a-place-with-spread-of-coronavirus-covid-19-.html>

What to do if you display any symptoms of Covid-19

If you are sick or display any of the following symptoms of Covid-19 you should not come into the office and complete your work duties from home.

- Cough
- Fever
- High Temperature
- Sore Throat
- Runny Nose
- Breathlessness
- Flu Like Symptoms

You should telephone your GP immediately to discuss your symptoms and request further guidance from which they may arrange for a Covid-19 test.

If your symptoms are mild and you are able to continue to work you should do so from home.

If your symptoms prevent you from working then the normal rules with regard to sickness will apply as outlined in the office manual.

Further information on illness benefit for COVID-19 absences can be found here

<https://www.gov.ie/en/service/df55ae-how-to-apply-for-illness-benefit-for-covid-19-absences/>

Clients & Visitors to the Office

Any clients or visitors to the office will be required to give their name and contact details to our receptionist for the purpose of maintaining a COVID-19 contact log in the workplace.

For clarity it should be noted for the purposes of this policy (and will also be noted on the contact log) that this data is being collected at the direction of the HSE and will only be used for the purpose of COVID -19 contact tracing and for no other purpose. It will be retained for no longer than 3 months.

We have identified the activities that involve interacting with clients/visitors and put in place measures to prevent physical contact, as far as possible to include the following:

- Client interactions and meetings to be carried out where possible over telephone, mail, email, zoom meeting
- Where absolutely required, client visits will be arranged by appointment only
- Client and visitor access to the office to be restricted by installing a buzzer at internal front door. This door will remain closed and will be released by receptionist once the visitor is identified and deemed necessary to enter.
- A Perspex screen installed at reception desk.
- Physical distancing tape and signs placed around the office at various points as required.
- Meeting rooms and waiting room adjusted to enable physical distancing
- Commissioner for Oaths appointments to be made at specific times for each person to ensure people arriving and leaving the office don't overlap

Control Measures to Prevent Infection

Coronavirus (COVID-19) is spread in sneeze or cough droplets.

You could get the virus if you:

- come into close contact with someone who has the virus and is coughing or sneezing
- touch surfaces that someone who has the virus has coughed or sneezed on and bring your unwashed hands to your face (eyes, nose or mouth)

The virus can survive on surfaces. Common household disinfectants will kill the virus on surfaces. Clean the surface first and then use a disinfectant.

Coronavirus can survive for:

- up to 72 hours on plastic and stainless steel
- less than 4 hours on copper
- less than 24 hours on cardboard

Hand Hygiene

Hand hygiene has been deemed one of the most important measures in the fight against Covid-19. Hand washing and hand sanitising stations are available in convenient locations that can be easily and frequently accessed by all employees and visitors. Posters are also displayed to encourage hand hygiene. The alcohol-based hand sanitiser we have provided contains at least 60% ethanol or 70% isopropanol as the active ingredient. We have made arrangements to ensure hand hygiene facilities are regularly checked and well-stocked e.g. hot running water, soap dispensers, paper towels, touch-free bins and hand-sanitiser.

How to wash your hands with soap and water

- Wet your hands with warm water and apply soap.
- Rub your hands together until the soap forms a lather.
- Rub the top of your hands, between your fingers and under your fingernails.
- Do this for about 20 seconds.
- Rinse your hands under running water.
- Dry your hands with a clean towel or paper towel.
- If you have dry skin or a skin condition, apply moisturiser after washing your hands and at night.

How to use hand sanitizer

- Apply hand sanitizer
- Rub your hands together until all surfaces are covered
- Rub the top of your hands, between your fingers and under your fingernails.
- Wait for about 20 seconds until your hands are dry.

When to wash your hands

- before and after eating and preparing food
- after coughing or sneezing
- after using the toilet
- before smoking or vaping
- where hands are dirty
- before and after wearing gloves
- before and after being on public transport

- before leaving home
- when arriving/leaving the workplace/other sites
- after changing tasks
- after touching potentially contaminated surfaces
- if in contact with someone displaying any COVID-19 symptoms

Respiratory hygiene

Good respiratory measures are also required to limit the spread of the virus:

- avoid touching the face, eyes, nose and mouth
- cover coughs and sneezes with an elbow or a tissue
- dispose of tissues in a covered bin

We have made tissues available to workers and covered bins or bin bags for their safe disposal. Regular bin emptying is also to be completed to ensure they don't overfill.

Social distancing

Social distancing is important to help slow the spread of coronavirus. It does this by minimising contact between potentially infected individuals and healthy individuals.

You should:

- keep a space of 2 metres (6.5 feet) between you and other people
- avoid any crowded places
- not shake hands or make close contact with other people, if possible
- There is very little risk if you are just passing someone. But try to keep a distance of 2 metres as much as possible.

We have completed a safety assessment in the entire office and made necessary adjustments to ensure physical distancing can be adhered to at all times in our workplace. This includes

- A door buzzer installed at inner front door to control entry
- Perspex screen installed at reception desk
- Physical distancing floor tape put in place as required
- Meeting rooms and waiting room adjusted to enable physical distancing
- Photocopier moved from reception to postal area
- Desks have been checked to ensure they are distanced 2 metres apart
- Canteen tables and chairs adjusted to ensure they allow for distancing
- Provision of disposable face masks if required
- Provision of gloves for use in retrieval of documents from store and strong room and otherwise as required

The placement of signage at various points around the office will regularly remind staff to adhere to physical distancing.

Minimising Contact & Cross Contamination

In an effort to minimise the need for business trips or for workers to gather for meetings and interactions we have made available the necessary technology provisions for online or phone meetings. We have also adjusted the existing meeting rooms to be allocated as follows:

- Room 4 – Zoom Room, allocated for zoom meetings
- Room 2 – double room, partitioned with Perspex dividers at door frame for high risk onsite meetings
- Board Room – Re-arranged seating to allow for social distancing
- Small consultation room now signed “Administration” for use as a designated ‘isolation room’

If for any reason employees have to meet together, we should ensure to use the boardroom where physical distancing can be done and for as short a time as possible

It is advisable for advised workers to travel alone if using your cars for work

The lift should be used by one person at a time

The canteen has been adjusted to enable social distancing. To further reduce the risk of cross contamination it is advised that shared utensils and crockery should be placed in the dishwasher for cleaning after each use. Hand washing of individual items should not occur. The dishwasher will run each evening and will provide a clean set of crockery and utensils each morning.

Personal Protective Equipment (PPE) [Guidance open to change]

Note: PPE use cannot take the place of other preventative measures. For COVID-19, employers & employees should check public health advice. Gloves are generally not required for infection prevention and control and are not a substitute for hand hygiene.

We will ensure a sufficient supply of disposable gloves and masks are available to employees & visitors where required.

N.B. We have implemented a specific rule for the use of gloves when working with paper files in the strong rooms, store rooms & file rooms. Gloves should be disposed of and hands washed or sanitised immediately before and after using gloves.

Ventilation

Increasing air changes in office buildings has been identified as a further control measure. To put it simply, if we are aiming to remove any trace of the infectious agent we must increase air supply and exhaust ventilation to all parts of the building. Where practical, in the absence of mechanical ventilation systems, it is advised that office occupants should actively use openable windows & doors (without compromising security) to boost air change rates. These should be opened effectively to ensure the airflow will ‘rinse’ the space, and not escape too quickly out of another window. It is also recommended that one person is designated to do this to reduce contact with others.

Dealing with a Suspected Case of Covid-19

If you develop any of the symptoms whilst on site the following should be noted:

Put on a disposable mask which should be worn while in a common area and when exiting the building.

Avoid touching other people, surfaces and objects

Immediately inform COVID-19 worker representative vmartin@mjoc.ie or boleary@mjoc.ie who will accompany you to the isolation room (designated room between Room 2 and Board Room), along the isolation route, while maintaining physical distancing (2 metres) from all other people in the building

The isolation room will be kitted out with the following to allow you follow safe hygiene practices:

- ventilation, e.g. fresh air ventilation/ability to open a window
- tissues
- hand sanitiser
- disinfectant and/or wipes
- gloves, masks
- waste bags
- pedal-operated, closed bin

Whilst in the room cover your mouth and nose with the disposable tissue(s) provided when you cough or sneeze, and put the tissue in the waste bag provided

If you feel well enough to travel home you should do so and call your GP and self-isolate at home. If this is not the case, you should remain in the isolation room and call your GP from there.

Transport home or to an assessment centre can be arranged if you have been directed to go there by your GP. You should not go to your GP's surgery or any pharmacy or hospital and you must not use public transport. You should continue to wear your mask until you reach home.

From that point, if the office is contacted by the HSE we will have our contact logs available to share if contact tracing is required.

We will carry out an assessment of the incident to identify any follow-up actions needed.

Remaining staff may leave and continue their work from home until it has been deemed safe to return to onsite working. In the meantime, it will be arranged for cleaning and disinfection of the isolation area and any works areas involved, at least one hour after the affected person has left the building.

General tips for cleaning/disinfecting rooms that persons with suspected or confirmed COVID-19 were isolated in.

- Keep the door to the room closed for at least one hour before cleaning. Do not use the room until the room has been thoroughly cleaned and disinfected and all surfaces are dry.
- The person assigned to clean the area should avoid touching their face while they are cleaning and should wear household or disposable single use non-sterile nitrile gloves and a disposable plastic apron (if one is available).
- Open the window while you are cleaning.
- Clean the environment and the furniture using disposable cleaning cloths and a household detergent followed or combined with Chlorine based product such as sodium hypochlorite

(often referred to as household bleach). Chlorine based products are available in different formats including wipes.

- Pay special attention to frequently touched flat surfaces, the backs of chairs, couches, door handles and any surfaces or items that are visibly soiled with body fluids.
- Place all waste that has been in contact with the individual, including used tissues, and masks if used, in a plastic rubbish bag and tie when full. Remove your apron and gloves and discard into the waste bag and clean your hands. Place the plastic bag into a second bin bag and tie it, then clean your hands.
- All waste that has been in contact with the individual, including used tissues, and masks if used, should be put in a normal waste bag. Double bagging should be used. The waste bag should be kept for 72 hours, then thrown into the normal waste.
- Once the room has been cleaned and disinfected and all surfaces are dry, the room can be put back into use.
- There is no need to clean carpets (if present) unless there has been a spillage.

Contact with Confirmed Cases

If a confirmed case is identified in the workplace, staff who have had close contact should be asked to stay at home for 14 days from the last time they had contact with the confirmed case and follow the restricted movements guidance on the HSE website

<https://www2.hse.ie/conditions/coronavirus/managing-coronavirus-at-home/self-isolation.html>

All affected staff should be actively followed up by the COVID-19 manager/response team.

If the person develops new symptoms or their existing symptoms worsen within their 14-day observation period they should call their doctor for reassessment.

The above eventualities will be recorded by the COVID-19 manager/response team.

Personnel who have been in close contact with a confirmed case include:

- any individual who has had greater than 15 minutes face-to-face (<2 meters distance) contact with a confirmed case, in any setting,
- household contacts defined as living or sleeping in the same home, individuals in shared accommodation sharing kitchen or bathroom facilities and sexual partners,
- passengers on an aircraft sitting within two seats (in any direction) of a confirmed case, travel companions or persons providing care, and crew members serving in the section of the aircraft where the index case was seated,

Personnel who have been in casual contact with a confirmed case includes:

- healthcare workers, not including laboratory workers, who have taken recommended infection control precautions, including the use of appropriate PPE, during the following exposures to the confirmed case:
- direct contact with the case (as defined above) or their body fluids;
- present in the same room when an aerosol generating procedure is undertaken on the case;
- any individual who has shared a closed space with a confirmed case for less than two hours.
- Passengers on an aircraft sitting beyond two seats (in any direction) of a confirmed case.
- Any individual who has shared a closed space with a confirmed case for longer than two hours, but following risk assessment, does not meet the definition of a close contact.

Cleaning & Disinfection

It is necessary to have a system in place of thorough and regular cleaning of frequently touched surfaces. It should be noted at this point that disinfection of contaminated surfaces is only effective if the area is first clean.

Cleaning removes germs, dirt, and impurities from surfaces or objects. Cleaning works by using soap (or detergent) and water to physically remove germs from surfaces. This process does not necessarily kill germs, but by removing them, it lowers their numbers and the risk of spreading infection.

Disinfecting kills germs on surfaces or objects. Disinfecting works by using chemicals to kill germs on surfaces or objects. This process does not necessarily clean dirty surfaces or remove germs, but by killing germs on a surface after cleaning, it can further lower the risk of spreading infection.

To achieve this the following is to be implemented and all necessary cleaning materials will be available at all times in order to do so:

Personal Workspaces

Each employee is responsible for keeping your own desk and immediate workspace clean and disinfected

Pens and stationery items should not be shared freely and avoid taking items from others desks or work areas

A clean desk policy is being introduced with immediate effect which means the only items left on desks should be tech items and stationery. When files and folders aren't in use they should be filed away or stored temporarily in your allocated storage boxes (to be made available to all) under or near your desk avoiding tripping hazards

Employees are responsible for cleaning personal items that have been brought to work and are likely to be handled at work or during breaks. e.g. mobile phone. You should clean these items and avoid leaving them down on communal surfaces or you will need to clean the surface after the personal item is removed.

Frequently touched surfaces within your personal workspace should be visibly clean at all times and cleaned at least twice a day.

This includes

- Doorknobs
- Light switches
- Chairs & Chair-backs
- Tables and desks
- Countertops
- Technology controls such as speakerphone buttons, remotes
- Desk accessories such as staplers, tape dispensers, and pen-cups
- Digital touchscreens
- Coat-racks and hangers

Please ensure to read and follow instructions on the product label/ Safety Data Sheet for any cleaning product(s) before use and that where relevant appropriate PPE should be worn

If you wear gloves when cleaning you need to wash your hands thoroughly with soap and water, both before and after wearing gloves

Reusable cleaning items for employees such as tea towels and cloths have been replaced with single use disposable alternatives to avoid cross contamination

Communal workspaces

The following frequently touched surfaces in the below listed communal areas will be tended to at set intervals twice a day by Seamas & Brid. Between these intervals, it is each employee's responsibility to also wipe down items in these areas after each use

Ground Floor

Front Porch & Hall

- Front Door Buzzer
- Doorknobs
- Light switches
- Alarm Pad
- Sanitizing dispenser
- Reception desk

Waiting Room

- Tables
- Chairs & Chair-backs
- Doorknobs
- Light switches

Downstairs Toilet

- Bathroom fixtures (toilet handles, faucets, soap and towel dispensers)
- Waste-bins
- Door and stall handles
- Ladies dispenser machine

Lift Shaft Room

- Doorknobs
- Light switches

Postal Room

- Tables and desks
- Countertops
- Technology controls such as speakerphone buttons, remotes
- Doorknobs
- Light switches
- Cabinet pulls and handles
- Postage meters, scales, and dedicated shipping computers
- Packaging and mail tools such as tape guns, letter openers, box cutters

- Trolleys, and carts

Meeting Rooms

- Tables and desks
- Countertops
- Chairs & chair-backs
- Doorknobs
- Light switches
- Cabinet pulls and handles
- Technology controls such as speakerphone buttons, remotes
- Televisions, touchscreens, and projectors
- Whiteboard accessories such as pens and erasers

DX Area

- Countertops
- Doorknobs
- Light switches

Stairs

- Stair bannisters

Lift to First Floor

- Elevator buttons

Comms Room/Strong Room/Store Room

- Tables and desks
- Countertops
- Chairs & chair-backs
- Doorknobs
- Light switches
- Cabinet pulls and handles
- Technology controls such as speakerphone buttons, remotes

N.B. We have implemented a specific rule for the use of gloves when working with paper files in the strong rooms and store rooms. Gloves should be disposed of and hands washed or sanitised immediately before and after using gloves.

First Floor

Ladies & Mens Toilets

- Bathroom fixtures (toilet handles, faucets, soap and towel dispensers)
- Waste-bins
- Door and stall handles
- Ladies dispenser machine

Landing

- Doorknobs
- Light switches

Lift to Ground Floor

- Elevator buttons

Canteen

- Appliance handles and controls (fridge, toaster, oven, dishwasher)
- Fixtures
- Chair-backs at seating areas
- Coffee station and coffee/tea service items

File Rooms

- Tables and desks
- Countertops
- Chairs & chair-backs
- Doorknobs
- Light switches
- Cabinet pulls and handles
- Shredder (controls and door handle)

N.B. We have implemented a specific rule for the use of gloves when working with paper files in the file rooms. Gloves should be disposed of and hands washed or sanitised immediately before and after using gloves.

Shared Items/Areas on First Floor

- Tables and desks
- Countertops
- Chairs & chair-backs
- Light switches
- Cabinet pulls and handles
- Phones, computer mice, and keyboards
- Desk accessories such as staplers, tape dispensers, and pen-cups
- Digital touchscreens
- Coat-racks and hangers

Covid-19 Support

The following resources provide links and guidance which aim to help you look after your mental health and wellbeing during the coronavirus outbreak.

<https://www.lawsociety.ie/Solicitors/Representation/wellbeing-hub/covid-19-support/>

<https://www2.hse.ie/wellbeing/mental-health/covid-19/minding-your-mental-health-during-the-coronavirus-outbreak.html>

<https://www.gov.ie/en/publication/256911-leaving-cert-2020-practical-supports/>

COVID-19 Return to Work Form

To help prevent the spread of COVID-19 in the workplace, every worker must complete and sign this form before returning to work. On review, management may contact you and ask you not to return immediately and discuss a suitable future date for your return. N.B. Every question **must** be answered.

Employee Name:	Manager Name:	
Workplace Address:		
Question		Yes / No
1. Do you have symptoms of cough, fever, high temperature, sore throat, runny nose, breathlessness or flu like symptoms now or in the past 14 days?		
2. Have you been diagnosed with confirmed or suspected COVID-19 infection in the last 14 days?		
3. Are you a close contact of a person who is a confirmed or suspected case of COVID-19 in the past 14 days (i.e. less than 2 metres for more than 15 minutes accumulative in 1 day)?		
4. Have you been advised by a doctor to self-isolate at this time?		
5. Have you been advised by a doctor to cocoon at this time?		
6. Please provide details below of any other circumstances relating to COVID-19, not included in the above, which may need to be considered to allow your safe return to work. Further information on people at higher risk from Coronavirus can be accessed https://www2.hse.ie/conditions/coronavirus/people-at-higher-risk.html		

* if you are unsure if are in an at-risk category, please check the information at the link in Question 6

** If your situation changes after you complete and submit this form, please tell management.

***If an employee has an underlying medical condition we will conduct a risk assessment with reference to HSE guidelines by referring the employee to an appropriate medical practitioner (chosen and paid for by the firm) for advice as to what steps should be taken to allow a safe return to work.

Print Name:.....Signature.....Date:.....

The information contained in this guidance is for educational purposes only and is non-exhaustive. It is not intended to provide legal advice to you, and you should not rely upon the information to provide any such advice. We do not provide any warranty, express or implied, of its accuracy or completeness. The Health and Safety Authority shall not be liable in any manner or to any extent for any direct, indirect, special, incidental or consequential damages, losses or expenses arising out of the use of this template. Employers are obliged to provide a safe workplace, which may include the processing of health data in order to ensure that safety. Articles 6(1)(c), Articles 9(2)(b) and (g), along with section 51 of the Data Protection Act, 2018 (which permits the processing of special category data for reasons of substantial public interest) will likely be the most appropriate legal basis for processing this data.