



**Fulcrum Asset Management LLP**  
**Infectious Disease Risk Mitigation Policy**

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## 1. Introduction

The government has published guidance for employers, employees and the self-employed on how to work safely during the COVID-19 pandemic. The latest guidance issued is available at the following link: <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres>. This policy encompasses these guidelines and will be updated accordingly as any new or additional guidance is published by the UK government. In case of such a policy update, employees will be informed as soon as practicable.

Fulcrum has established a working group comprising of members from its Compliance, Risk Management and HR teams to monitor UK government guidance and review its implications to Fulcrum's business operations and to ensure it effectively maintains measures to protect the welfare of its internal and external stakeholders.

The office is being prepared to conform with the UK government guidance and is expected to be ready from the 1<sup>st</sup> September, 2020. Employees were consulted in August regarding their preferences and material facts impacting their ability to work from the office. As of 1<sup>st</sup> September certain members of staff will be able to work from the office provided they do so in compliance with the social distancing guidance provided. No other staff member shall attend the office without the explicit approval of Joe Davidson or Helen Tunley.

## 2. Purpose and Scope

The purpose of this policy is to set out and communicate to staff the outcome of Fulcrum's risk assessment and the impact of infectious diseases, in particular COVID-19, and the mitigation measures implemented by Fulcrum. It applies to all staff members working or wishing to work at Fulcrum's premises. For the purpose of this policy, staff refers to all employees, members of Fulcrum Asset Management LLP, third-party contractors, staff interns and all other onsite visitors.

In general, each staff member is responsible for risk management with respect to their individual job. With respect to the risk of spreading of infectious diseases, all staff are required to follow the policy and procedures as set out below and *periodically updated*. Staff are required to follow all the procedures diligently, to sustain a healthy and safe workplace for all and to limit the spread of infectious diseases in the society. Fulcrum implements all measures that are mandatory and also ones that are likely to be beneficial and are practicable to implement.

## 3. Personal Data Security

Your private health and relating personal data is treated with high confidentiality and is considered sensitive information within the meaning of the applicable General Data Protection Regulations.

## 4. Policy elements

Fulcrum aims to make work as safe as possible and has established this policy and procedures tabled in Appendix A - F, accordingly. Certain elements of this policy are in direct effect when the risk of infectious disease is elevated or higher.

The minimum requirements are set by the mandatory elements of the [UK government COVID-19 guidelines](#). Fulcrum has also reviewed the non-mandatory guidelines and has decided to implement the measures that are applicable to our business and office space. Infectious diseases spread by physical contact with the pathogen, which may be the result of direct, or indirect contact with a carrier of the pathogen. The most effective mitigation is thus limiting contact, direct or indirect, with other carriers.

Working from home is recommended for staff who are clinically extremely vulnerable or have close contacts with such individuals.

## 5. Training

Once circulated, staff will be required to attest to having read and understood this document.

Going forward, the latest version of the policy will be made available on Fulcrum's website as well as Jira. Staff will be required to confirm that they have read and understood the policy on their quarterly attestation form which is circulated by the Compliance team following the end of each calendar quarter.

This document covers the following areas:

- signs and symptoms of COVID-19
- how COVID-19 is spread
- cleaning routines and hygiene controls (including respiratory hygiene, cough etiquette and handwashing and physical distancing)
- what to do if an employee or a visitor becomes unwell and believe they have been exposed to COVID-19
- when individuals in the workplace have had contact with a confirmed case of COVID-19
- rubbish disposal, including tissues
- travel restrictions
- restricted movement advice
- make people aware in an emergency; fire etc., we do not maintain social distancing

## Appendix A – 5<sup>th</sup> Floor Risk Assessment

In keeping with the latest government guidelines Fulcrum instructed an external health and safety consultant, William Martin, to conduct a COVID-19 risk assessment, which is available to view upon request. This risk assessment is formed Fulcrum's COVID-19 Risk Assessment.

[Click here for the link to Fulcrum's COVID-19 Risk Assessment.](#)

## Appendix B – Background on COVID-19 and Emergency Procedures

### B.1 COVID-19 What is it and how is it spread?

COVID-19 is a disease caused by a new strain of coronavirus. 'CO' stands for corona, 'VI' for virus, and 'D' for disease.

The virus that caused COVID-19 disease is spread from people to people in fluid and in droplets scattered from the nose or mouth of an infected person when the person with COVID-19 coughs, sneezes or speaks. The fluid or droplets land on objects and surfaces around the infected person. Other people contaminate their hands by touching these objects or surfaces and then bring the virus into contact with their eyes, nose or mouth by touching them with their contaminated hands. COVID-19 can also spread if droplets from an infected person land directly on the mucous membranes of the eyes, nose or mouth of a person standing close to them.

### B.2 Signs of COVID-19

The main symptoms of COVID-19 are:

- A high temperature – this means you feel hot to touch on your chest or back
- A new, continuous cough – this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual)
- A loss or change to your sense of smell or taste – this means you've noticed you cannot smell or taste anything, or things smell or taste different to normal
- Most people with COVID-19 have at least 1 of these symptoms

### B.3 What to do if you have or suspect you have COVID-19

- An employee with COVID-19 must stay at home and inform the COO/Helen Tunley immediately
- Do not come into the office if you or anyone you live with has come into close contact with or is experiencing COVID-19 like symptoms. Symptoms include a cold, persistent cough, difficult breathing, fever (38.0° C [100.4° F] or greater using an oral thermometer) and a loss of taste/smell. Notify the COO/Helen Tunley immediately, and self-isolate
- For current information on how long you should self-isolate, and therefore stay away from the workplace, please refer to NHS guidance, which can be found at this link. <https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/>

- Please check your temperature each day before you leave for the office. If you do have a temperature (over 37.5), please stay at home
- If you or a visitor feels unwell whilst at work, please make your way to the allocated self-isolation room (Meeting Room: Portland, by the small kitchen). Make sure you inform a colleague so that they can either call 111 or let the Single Point of Contact (SPOCs are either the COO, Helen Tunley, Office Manager or the Admin Manager) know, as they can also call 111 for you. Once 111 have been consulted we can either send you or the visitor home or to the hospital
- The SPOC will inform the Marble Arch House building manager and both the building and office will be deep cleaned
- The company will also provide the building management team with the following details should an employee or visitor test positive for COVID-19
  - date of positive test
  - date and time the individual was last present in the building
  - locations the individual visited
  - actions taken in response to the positive test
- Reporting of Injuries, Diseases and Dangerous Occurrences Reporting (RIDDOR) – Should there be reasonable evidence that an individual has been exposed to COVID-19 whilst at work, the appointed first aiders will fill in a report online via the Government’s Health & Safety website – <https://www.hse.gov.uk/>

## Appendix C – Fulcrum Back to Work Procedures

### C.1 Government Guidance

The UK Government has published guidance on plans to return to the work. Current guidelines can be found here:

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres>

The public health advice is updated regularly and subsequently we will need to update policies as necessary. We will give you every opportunity to comment on any changes we propose.

### C. 2 Working from home

- As your terms of employment remain unchanged you may be directed to work from home or from the office as appropriate.
- From 1<sup>st</sup> September, 2020, all staff should work from home unless they have elected to work from the office and it has been authorised by the COO or Helen Tunley
- For those working from home virtual desk assessment can be scheduled by the Office Manager, upon request. IT Equipment and office equipment (desk chairs, screens etc) can be provided upon request to ensure safe and efficient remote working
- As it relates to mental wellbeing BUPA offers a helpline manned 24hours a day by a qualified nursing team where you can chat about things that are concerning you

## C. 3 Pre-checks before returning to work

- All employees to fill in return to work questionnaire
- All employees to read and sign this training document before return to work (see training)

## C. 4 Commuting

- Staff working from the office should follow the current guidelines <https://tfl.gov.uk/campaign/safer-travel-guidance>. Please note that wearing a face covering on public transport is mandatory at this time.

## C. 5 Hygiene / Personal Responsibility

- Employee hygiene practices are important to prevent the spread of COVID-19. We have put up signage to communicate government and NHS recommendations to prevent infection spread. We encourage all staff to maintain high levels of hygiene whilst in the workplace
- Employees are encouraged to wear gloves when travelling to/ from work
- Upon arrival at the office, please make sure you wash and sanitise your hands immediately. Please make sure you continue to do this regularly throughout the day. It is important to follow good practices for hand washing which include using soap and water and washing for over 20 seconds. Touching of the face should be avoided
- Despite of the ongoing debate regarding benefits of wearing face coverings or face masks, following our risk assessment, **it is strongly recommended to wear a mask or face covering in the office whenever practicable eg when talking face to face with a colleague or when walking around the office communal areas, eg corridors, reception, kitchens and toilets.**
- All single-use masks or coverings are to be disposed of in the allocated waste bins found near the reception, main access door and the main kitchen area
- Do not share your personal equipment with other staff members
- Please sneeze/ cough into a tissue and dispose of it immediately
- Please strive to maintain a clear desk policy. Boxes will be supplied for you to clear your desks each evening. If you do so it will mean that your desk will be thoroughly cleaned
- Whiteboards and pens are to be wiped down thoroughly after use
- Fulcrum will have a supply of face masks and gloves

## C. 6 First Aid and Fire Procedures

- From 1<sup>st</sup> September first aiders will be Marble Arch House Building Security.
- From 1<sup>st</sup> September, given that a minority of staff are returning, all staff members on the approved 'return to the office' list will be required to conduct an on-line fire marshal training course.
- In an emergency, for example, an accident or fire evacuation, people do not have to comply with social distancing guidelines if it would be unsafe, however particular attention is to be made to sanitation measures immediately afterwards, including washing hands
- In the event of an emergency or fire evacuation, all employees should follow the usual fire procedures [\[see plan\]](#) and the fire marshals will perform the roll call

## **C. 7 Cleaning**

- Steps have already been taken to clean the workplace thoroughly in line with the latest government guidelines. P&H Cleaning are responsible for cleaning the 5th floor
- We have a dedicated cleaner who will clean daily during the week between 8.30am to 4pm. The cleaner will regularly clean the office including the reception area, toilets, meeting rooms, door rails and kitchen areas
- Our cleaners have been in-housed trained by P&H management to carry out COVID-19 cleaning and will use a virucidal/bacterial product called Ultra AX to clean all surfaces. They will also be wearing the appropriate PPE equipment
- The office will not have an additional clean in the evening until further notice.
- Each desk, meeting room and communal surface has been provided with sanitisers and antiseptic wipes. Please make sure you regularly clean your own desk and wipe down any communal areas (i.e., printers) that you may use. Please notify the Office or Admin Manager if you require any additional supplies
- Fogging (a form of deep cleaning, targeting the removal of viruses) will take place monthly in all 5th floor areas and will start in August 2020

## **C. 8 Social distancing and the new office layout**

- Employees should always be mindful of other people moving around the office and make every effort to observe the social distancing requirements. Signs and notices have been placed at appropriate points around the office
- When using communal corridors or walkways people should respect social distancing. People should walk in single file when walking along the central walkways on the floor and should give way whenever another staff member is walking in the opposite direction
- No hot desking is allowed and you should not switch desks without prior permission from the COO
- Employees are requested to use their own stationary and not share pens, pencils etc
- Occupancy levels will be maintained by splitting the office into bubbles to enable social distancing

## **C.9 Access**

- The main access points will now be locked (timers opening doors during office hours will be switched off) and lanyards<sup>1</sup> are to be worn at all times to gain access
- Do not prop the doors open
- Please adhere to the single file, give way and social distance signage
- Please reduce any non-essentials trips in, out and around the building.

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<sup>1</sup> These will be supplied by Fulcrum onsite.

## C.10 Meetings / Visitors / Contractors

- In-person meetings should be done virtually where possible, especially with non-company parties.
- If face to face business critical meetings are necessary please obtain written permission from the COO
- No refreshments can be served to visitors until further notice
- Do not share equipment during meetings
- The conference rooms indicate where everyone can safely sit to adhere to these rules
  - Boardroom 8 person capacity
  - Seymour 2 person capacity
  - Colourful 4 person capacity
  - Portland 2 person capacity
  - Meeting room 5 4 person capacity
  - Meeting room 6 3 person capacity
- Do not sit on the redundant chairs and please do not change the configuration of the chairs that are around the meeting tables
- Where possible schedule essential contractor visits for 'out of hours'
- Maintain a record of all visitors and contractors

## C.11 Coat Cupboards

- The coat cupboards are out of use for the time being for staff and visitors. Please take you coats to your desk and ask visitors to take their coats into the meeting rooms

## C.12 Kitchen Area and Food

- The small kitchen in the meeting rooms area will be used by MAIA, FAS and Marketing, and a microwave has been purchased
- The main kitchen will be used by all other departments
- Please wash/sanitise your hands before entering the kitchen
- Make every effort to social distance in this space, the guideline is no more than 2 people at one time in the main kitchen and 1 person at a time in the small kitchen
- Employees should not offer to make refreshments for anyone else
- Employees should avoid socialising and congregating in small areas
- Employees should wipe down any communal equipment they use with the cleaning products supplied

## C.13 Toilets

- Only 2 people at a time to be in each of the main toilet rooms. Two cubicles will be made available for use in the women's and only one cubicle and a urinal will be made available for use in the men's toilet
- All toilets have been newly fitted with a toilet lid. Please close the lid before you flush
- The toilets will be regularly cleaned
- Additional wipes and paper towels have been provided

## Appendix D - Landlord Communal Spaces

This is being provided for completeness, but this is the Landlord's remit. More details are available in the following documents

[Marble Arch House Access Strategy](#)

[Marble Arch House Reoccupation Strategy](#)

### D. 1 Access

- Signage will be installed to keep 2m social distancing principles at reception desks, access barriers, front doors and lifts
- Keep left policy will be implemented in all areas under the landlord's demise
- One-way entry and exit system will be implemented at the ground floor doors (entry through revolving doors, exit through button operated door)
- Only two people in the lift at one time
- Employees arriving by bike should access the cycle parking in the basement via the door next to the loading bay in Hampden Gurney Street

### D.2 Cleaning / Showers & Communal Toilet

- Touch points such as door handles, door push plates, stair handrails, reception desks, intercoms and lift call will be disinfected on an hourly basis
- Hand sanitiser dispensers will be available at points of entry and exit, showers, sitting areas and lift call units
- Common area toilets will be cleaned hourly to disinfect touch points
- Showers and changing rooms will be cleaned hourly during peak hours such as the morning and lunch times. This will include cleaning all surfaces and disinfection of shower heads
  - In order to maintain and manage appropriate social distancing within the shower areas, a booking procedure will be put into place which will be managed by the Front of House Team Shower booking system – Please book showers in advance through security and reception. A shower will then be allocated to the individual, [showers.marblearch@britishland.com](mailto:showers.marblearch@britishland.com), please cc [receptionmah@britishland.com](mailto:receptionmah@britishland.com) and [securitymah@britishland.com](mailto:securitymah@britishland.com)
- Work areas will be sanitised after every personnel or shift change

### D.3 Deliveries

- Personal deliveries are to be avoided
- Big deliveries must be pre-booked via security at least 24 hours in advance
- Only two people will be allowed in the goods lift at one time

### D.4 Ground Floor Reception

- Front office staff will be provided with masks and gloves and Perspex screens will be set up on the front house desk
- Only pre-booked visitors will be permitted, and couriers will be restricted to loading bays

## **D.5 Health & Safety**

- Fogging (a form of deep cleaning, targeting the removal of viruses) will take place monthly in all communal areas
- In the event of confirmed Coronavirus within the building an immediate deep clean of the potentially affected common areas will take place

## **D.6 Maintenance & Engineering**

- The building's Heating, Ventilation and Air Condition (HVAC) plant will be running at normal speeds 24/7. The ventilation is switched to nominal speed at least 2 hours before the building usage time and switch to lower speed 2 hours after the building usage time. There will be no temperature control from 21:00 – 05:00 in order to save energy
- The ventilation of toilets and showers area is running 24/7
- The Air Handling Units (AHU) will supply 100% fresh air
- The Fan Coil Units (FCU) on each floor will locally recirculated the air. Each fan coil unit is thus supplied with fresh air and this is then mixed with recirculated office space air from the 5<sup>th</sup> floor. No air will be shared between floors. The entire air volume of each floor is fully refreshed approximately 2.5 times per hour and no air will be shared between floors
- The Demand Control Ventilation system (DCV) has been removed from service temporarily to ensure maximum external fresh air

## **Appendix E – General Office Procedures**

### **E.1 Travel – Business and Personal**

#### **Business Travel**

- All in person work trips and events – both domestic and international – are prohibited until further notice

#### **Personal Travel**

- you must check the current government guidelines for the country you will be visiting. Please notify your manager of your proposed destination. Depending on the destination/ circumstances and current Government advice, you may be requested to work from home for up to 14 days upon returning to the UK

## **E.2 Holidays**

- You are allowed to carry over 10 days holiday from 2020 into 2021. These 10 days must be used up by the end of Q2 2021

## **E.3 HR Portal – Iris HR**

- All staff to keep an up to date absence record
- All staff to make sure their personal contact and emergency contact details are kept up to date

## **E.4 Wellbeing and Additional Staff Support**

- We would like to remind you that you have access to a confidential telephone counselling service if you would like to talk to a trained counsellor about any worries that you may be having about the impact of coronavirus, whether work related or not. See Appendix B for contract details
- If you have any queries or concerns in relation to returning to the workplace or this procedure, please contact the COO or Helen Tunley in order to discuss your circumstances

## Appendix F – Useful Contacts and website links

<p><b>Bupa Healthcare</b></p>	<p>Bupa Healthline (0345 604 0537) Manned 24 hour a day by qualified nurses who will offer practical advice on anything that is concerning an employee An employee does not need GP recommendation for counselling. They can approach Bupa directly.</p> <p>Furthermore, all employees have access to a virtual GP and face to face GP.</p>
<p><b>Office Manager to request virtual desk assessment</b></p>	<p>Severine Desrosiers E: Severine.Desrosiers@fulcrumasset.com T: +44 (0)20 7016 6466</p> <p>Juliana Rodrigues E: <a href="mailto:Juliana.Rodrigues@fulcrumasset.com">Juliana.Rodrigues@fulcrumasset.com</a> T: +44 (0)20 7016 6466</p>
<p><b>UK Government Guidance</b></p>	<p><a href="http://www.gov.uk/workingsafely">www.gov.uk/workingsafely</a></p>
<p><b>IRIS, Fulcrum’s HR management tool</b></p>	<p><a href="https://irishrcloud.co.uk/portal/">https://irishrcloud.co.uk/portal/</a></p>
<p><b>Coronavirus (COVID-19) helpline</b></p>	<p>If you do not have symptoms and are looking for general information, a free helpline has been set up on: 0800 028 2816</p>