

Fulcrum Asset Management LLP
Infectious Disease Risk Mitigation Policy

Versions

Version #	Date	Approved by	Changes made
Version 1		Joseph Davidson	First version
Version 2	26 August 2021	Joseph Davidson	Update to returning to the office (introduction section)
Version 3	22 September 2021	Joseph Davidson	Update re vaccination policy, travel and isolation requirements according to UK Government advice changes
Version 4	14 October 2021	Joseph Davidson	Update to returning to the office (introduction section) Changed footnote 1 on page 5 Took out any reference to social distancing and point C.8 Reinstated evening cleaners Changed C.6 First Aid and Fire Procedures Deleted C.11 & C.12
Version 5	9 th November 2021	Joseph Davidson	Added Overview and Guidance section Updated links to government guidance Update on fogging and air conditioning
Version 6	9 th December 2021	Joseph Davidson	Added statement about working from home as of 13 th Dec 21
Version 7	4 th January 2022		Added changes to self isolation

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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.

UPDATE (as of 4th January 2022)

Self-isolation. If you are fully vaccinated and tested positive for COVID-19, it is now possible to end self-isolation after 7 days, following two negative lateral flow tests taken 24 hours apart. The first test should not be taken before the sixth day.

Contacts of positive cases. If you are fully vaccinated, contacts of a positive case are now required to conduct daily lateral flow testing (not PCR tests) for 7 days.

Clinically Extremely Vulnerable: Working from home is recommended for staff who are clinically extremely vulnerable (CEV) or have close contacts with such individuals. We are now able to record this data. Please update our HRIS "bob" to indicate if this applies to you, so that we can fully support your needs. This data will not be shared outside of HR.

Attendance in the office: As of Monday 13th December 2021, everyone who can comfortably work from home should do so. Staff may attend the office if they deem it necessary, but this is no longer being actively encouraged. Please also note that face to face meetings with external people using the Fulcrum offices are also discouraged. If attending the office, we request that all staff conduct a lateral flow test on the morning of their attendance at the office. Wear a face mask when walking / standing in shared areas (i.e., corridors, kitchen, reception). Please bear in mind that you wear a mask primarily to protect others: your colleagues, clients, and their families.

Reception will continue to be staffed during this latest stage and daytime cleaning will be reduced to 2 days per week. We will revert to trialling the 3:2 office attendance once Government guidance recommends a return to the office.

Overview of Guidance

To ensure we all remain safe, whilst attending the office we ask that all employees (and their guests) using the office follow the practices defined below. (Links are provided where there is detailed and up to date government guidance):

If you have any symptoms (however mild)

1. **Stay at home.** If you have already arrived at work and begin to experience any symptoms, you should return home immediately. (<https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms/main-symptoms/>). Note that many people have different symptoms than those

listed on the NHS website and the variants can have slightly different symptoms. To be safe, if you are feeling at all unwell (even with a cold), stay at home.

2. **Notify your manager and HR** (HR@fulcrumasset.com) this can be by email or in person that you are either working from home or that you are sick.
3. **Follow Government self-isolation and testing guidance.** (<https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/when-to-self-isolate-and-what-to-do/> and <https://www.gov.uk/get-coronavirus-test/>). Note, that this guidance changes and should be checked before taking action.

Positive Covid-19 test in the office

4. **HR will notify the entire business** as soon as is practicably possible following notification of a positive test result from an individual who has been in the office: *“Notification of positive Covid-19 case”*.
5. Details will include; the name of the individual who has tested positive and also the dates they were in the office in order to help people ascertain if they are a potential contact and therefore what action to take. For more information on your level of contact see this link for more details: <https://www.gov.uk/government/publications/guidance-for-contacts-of-people-with-possible-or-confirmed-coronavirus-covid-19-infection-who-do-not-live-with-the-person/>
Note, that additional precautions are advised such as; limiting contact in enclosed spaces, wearing a mask in enclosed spaces where you are unable to maintain social distancing. This reduces the risk of passing on the infection unknowingly to others.
6. If you have not been fully vaccinated the guidance is different and you may need to self-isolate. See this link for more details: <https://www.gov.uk/government/publications/guidance-for-contacts-of-people-with-possible-or-confirmed-coronavirus-covid-19-infection-who-do-not-live-with-the-person/>

Requirements to reduce the risk of transmission in the office

7. Take up vaccinations and boosters offered by the government which offer you protection from severe illness and reducing transmission to others.
8. All staff and guests wear a face mask when walking/standing in shared areas (i.e., corridors, kitchen, reception).
9. In meeting rooms, where social distancing cannot be maintained, masks should be worn by all meeting participants. Please bear in mind that you wear a mask primarily to protect others; your colleagues, clients, and their families.
10. All staff attending the office should undertake a lateral flow test twice a week to help proactively manage potential 'symptom-free' transmission.
11. If strictly necessary external meetings are now allowed but visitors should follow guidance detailed in this guide. Signage will be displayed to summarise the key points that visitors will need to note including that no guest should come into the office if they have been tested positive or show any symptoms of the Covid-19.
12. We have implemented a clear desk policy and have assigned a labelled pedestal that you can place your work, keyboard and mouse into at the end of each evening. This enables us to have clean the desks thoroughly.

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. Disclosure of infected individuals is done so only to allow others to follow Government guidance.

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 (CEV) or have close contacts with such individuals. Please update our HRIS "bob" to indicate if this applies to you, so that we can fully support your needs.

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 – 5th 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 [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?

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

These symptoms may change, especially with the emergence of new variants of COVID-19 and up to date information is available at: <https://www.nhs.uk/conditions/coronavirus-covid-19/symptoms/main-symptoms/>

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

- An employee with COVID-19 must stay at home, following the government guidance on isolation. The HR department (HR@fulcrumasset.com) and your manager must be informed immediately.
- If you have been a contact of someone with COVID-19 symptoms or has tested positive, please refer to the [government guidance on testing, self-isolation and treatment](#) (guidance is different for those who have been fully vaccinated and those who have not) and <https://www.gov.uk/get-coronavirus-test>
- Do not come into the office until you are more certain that you have not contracted COVID-19. This action will reduce the risk of transmission. (Symptoms can be checked on the [NHS website](#). 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 HR Department immediately and follow the Government guidance.
- If you or a visitor feels unwell whilst at work or receives confirmation of a positive Covid-19 test, please go home immediately). If the situation requires medical assistance, contact either the HR Department or the Office Manager in order to call 111.
- All attendees attending the office on the day of the infection being reported will be asked to return home as soon as practically possible, taking additional precautions to reduce transmission to others should they have been infected (i.e., take a direct route and wear a mask at all times) and follow [government guidance on testing, self-isolation and treatment](#).
- 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.

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.

- 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 Before returning to the office

- All employees to read and sign this training document before return to the office (see training)
- We recommend ensuring you are fully vaccinated (to include any booster recommendations made by the UK Government) to reduce the risk of becoming infected with Covid-19 or transmitting the virus to others whom you meet.

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.
- 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.
- It is strongly recommended to wear a mask or face covering in the office, when social distancing is not possible e.g., when talking face to face with a colleague, in a meeting room or when walking around the office communal areas, e.g., corridors, reception, kitchens and toilets. Those who are not vaccinated must wear an FFP-2 mask at all times when in the office.
- 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.
- When you have finished using equipment that may be used by others (e.g., keyboards, screens etc., please clean before you leave).
- Please sneeze/ cough into a tissue and dispose of it immediately. Please follow good hygiene practices such as handwashing when you do
- Please strive to maintain a clear desk policy and those hotdesking please place your work and possession in your pedestal 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 FFP-2 grade face masks and gloves.

C. 6 First Aid and Fire Procedures

- First aiders if on site should be contacted in the first instance. If you are unable to locate a first aider then please contact Marble Arch House Building Security (Main number 020 7258 5190 manned 24hrs and mobile 07779 414 671) who will direct you.

- In an emergency, for example, an accident or fire evacuation, particular attention is to be made to sanitation measures immediately afterwards, including washing hands and wearing a mask if this does not reduce your ability to evacuate immediately.
- 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, twice a week (whilst the Government guidance is to work from home). During times that the office is fully open to employees, the cleaner will regularly clean the office including the reception area, toilets, meeting rooms, door rails and kitchen areas. The evening cleaners will thoroughly clean all desks and phones.
- 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
- 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 Manager if you require any additional supplies
- Fogging (a form of deep cleaning, targeting the removal of viruses) will take place at least monthly in all 5th floor areas. The effects of the fogging lasts 30 days and therefore it is not required to be repeated if there is a positive case in the office.

C.8 Access

- The main access points will now be locked (timers opening doors during office hours will be switched off) and lanyards¹ are to be worn at all times to gain access
- Do not prop the doors open

C.9 Meetings / Visitors / Contractors

Several measures can be taken to reduce the risk of infection and transmission; ensuring individuals are fully vaccinated, wearing masks and increased handwashing/sanitation. Therefore, the following recommendations are made:

- Virtual meetings are an option that should be considered, especially with non-company parties.
- If face to face business-critical meetings are necessary, please ensure that these meeting occur outside or inside with masks being worn.
- Reception must be informed of the name(s) of the guest(s) attending with their contact details (email).
- Reception will then send out an email to the external guest(s) attaching this policy and giving the guest(s) instructions on what to do upon arrival at the Fulcrum office.
- The Fulcrum invitee will be responsible for their guest(s) at all times

¹ These will be supplied by Fulcrum onsite.

- Do not share equipment during meetings
- Where possible schedule essential contractor visits should be scheduled 'out of hours'
- Maintain a record of all visitors and contractors

C.10 Toilets

- 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 [here](#)

D. 1 Access

- 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 Enhanced hygiene and cleaning measures

- Hand sanitisation stations – have been installed at all entry and exit points within our buildings, as well as in all toilet facilities.
- Signage is in place to encourage everyone to make use of them and to follow the Government's guidance on handwashing.
- Zero-touch journeys – wherever possible, we've implemented a zero-touch journey through entrances and exits, walkways, corridors and lifts to help minimise the risk of contamination. Access barriers have also been reconfigured to allow access cards to be touch free – customers do not need to touch the sensor, just hold the card near.
- Regular cleaning – key touchpoints and shared areas, including showers and changing rooms, are being disinfected on an hourly basis or after a personnel change, and deep cleaned regularly. Hand dryers are available for use as well as hand towels where appropriate.
- We're encouraging the wearing of face coverings in common areas such as receptions and lifts. Personal protective equipment – our building management team will continue to wear face coverings if they are able to, and Plexiglass screen barriers remain in place at our service desks.
- Increased bicycle storage facilities – as more people choose to cycle to work, additional bicycle parking facilities have been installed across our campuses and buildings. We are asking everyone to be considerate of others and to respect personal space. Visitor management – we ask that all visitors are pre-booked and that they collect their own pass from printers

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 Perspex screens will be set up on the front house desk

D.5 Health & Safety

- Fogging (a form of deep cleaning, targeting the removal of viruses) will take place monthly in the office
- Regular cleaning is being undertaken in Fulcrum's office as well as in communal areas

D.6 Maintenance & Engineering

- Ventilation and air conditioning HVAC (Heating, Ventilation, and Air-Conditioning) systems are widely used in our offices. The recirculation of air has been turned off to reduce the risk of contamination.
- Our technical teams have developed a best practice management plan for our HVAC systems, drawn from the guidance published by REHVA - the Federation of European Heating, Ventilation and Air Conditioning Associations. RHEVA is the leading European professional organisation for mechanical services of buildings and the Chartered Institute of Building Services Engineers (CIBSE) are the UK representatives.
- We will continue to make any necessary adaptations to maintain comfortable conditions within our spaces, while continuing to follow the latest REHVA and CIBSE Covid-19 guidance

Appendix E – General Office Procedures

E.1 Travel – Business and Personal

Business Travel

- All in person work trips and events – both domestic and international - should be carefully considered prior to planning and booking by carrying out a risk assessment to determine if there are alternative actions that are equally/acceptably effective. All staff to understand and follow [Government guidance](#) before arranging travel.

Personal Travel

- You must check the [current government guidelines](#) for the country you will be visiting. Please consider the number of days that you will not be able to attend the office prior to receiving any required test result and organise your schedule accordingly

E.2 Holidays

- You are allowed to carry over only 5 days holiday from 2021 into 2022 as per normal practice. These 5 days must be used up by the end of Q1 2022.

E.3 HR Portal – Bob 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 HR Department in order to discuss your circumstances

Appendix F – Useful Contacts and website links

Bupa Healthcare	<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>
Office Manager to request virtual desk assessment	<p>Juliana Rodrigues E: Juliana.Rodrigues@fulcrumasset.com T: +44 (0)20 7016 6466</p>
UK Government Guidance	<p>www.gov.uk/workingsafely</p>
IRIS, Fulcrum’s HR management tool	<p>https://irishrcloud.co.uk/portal/</p>
Coronavirus (COVID-19) helpline	<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>
HR Department	<p>HR@fulcrumasset.com</p>