

MIWFM Approved by: Decision Making Group (DMG)

Date last updated: 15/03/2021

Date of next scheduled review: Continuous review – latest versions on Intranet and Internet

Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R1	Spread of COVID-19 in Wrigleys	<p>This will result in multiple individuals (partners, solicitors, and colleagues) becoming infected and possibly seriously or fatally ill</p> <p>Vulnerable workers could be worst affected</p>	<p>Most partners and colleagues (where possible) to work from home. Review onsite and offsite work arrangements including working from home, setting rotas, and placing staff in teams or shift groups for onsite working. For example, team A to be in the office on week 1 and 3 of the month and team B to be in the office on week 2 and 4 of the month.</p> <p>Take steps to review work schedules including start and finish times/shift patterns, to reduce the number of people on site at any one time</p> <p>Manage occupancy for our offices at any time</p> <p>Desks sealed with tape to encourage physical distancing</p> <p>Closure of communal areas OR putting in place social distancing markers and measures in communal areas including kitchens</p> <p>Anyone with COVID symptoms or otherwise required to self-isolate (including by a request from NHS Test and Trace) should not come to work and should refer to the <a href="#">NHS</a> and government guidance as appropriate.</p> <p>Refer to HR sickness policies. Communication and awareness-raising posters referring to the above measures</p> <p>Enhanced cleaning regime, including for toilets, kitchens, and frequent touchpoints such as door handles, light switches, reception area using appropriate cleaning products and methods</p> <p>Hand washing awareness: see the <a href="#">NHS guidance</a></p>	<p>Everyone who can work from home should do so. The offices are COVID Secure. IT and Operations are ensuring that working from home or the offices is possible for an extended duration.</p> <p>DMG will communicate on a timely basis and provide information posted on Microsoft Teams. The communications will include links to Government and HSE advisory sites.</p> <p>Colleagues wanting to be in an office are required to liaise with Head of Department (or as advised by them) to be added to the colleague working rota system. Only rota listed colleagues will attend – to restrict occupancy levels based on overall office attendance and traffic flows and specific departments/areas. See floor plans in Covid section of the intranet for details.</p> <p>A sign-in and sign-out book is next to the lift in the Leeds office. Pens are available, but you are encouraged to use your own. In Sheffield, the Paxton swipe system will be used to log colleagues entering and exiting the building. Occupancy levels are monitored for attendance levels by Operations Team. Rota attending colleagues still need register that they have been in the office by using the systems detailed above.</p> <p>Leeds reception desk has a glass screen for protection. Receptions have PPE and sanitiser available. All Meeting Rooms have PPE and sanitiser. Wall mounted sanitisers in place throughout offices, and disposable wipes at print areas.</p> <p>Occupancy limits are affected by HSE guidelines for First Aid requirements. Notifications</p>

			<p>Sanitation products (hand sanitiser, cleaning wipes) widely available. Consider providing a 'cleaning pack' for colleagues with hand gel, wipes etc</p> <p>Reminding everyone of the public health advice through posters, leaflets and other materials made widely and prominently available: see the <a href="#">government guidance</a></p> <p>Consider measures to prevent people from placing personal item as (such as coats/bags) in places where they may contribute to transmission</p>	<p>on entry to buildings in-place. Notifications of any H&amp;S issues should be made to Operations.</p> <p>No required action on desks separation due to low occupancy levels. Ongoing review as occupancy levels increase.</p> <p>The firm encourages all colleagues to operate a Clear Desk Policy (CDP) to allow thorough cleaning of all work areas. Internal users refer to Wrigleys Intranet (Coronavirus – Guidance on Returning to Offices)</p> <p>Leeds colleagues – should consider opening windows when they are in the office. Windows must be closed before leaving the office.</p> <p>Kitchens, social areas, lifts, stairs, and other communal locations now have advisory signage in-place. There are information posters in locations, entrances, notice boards, other, to explain how the space should be used and applicable restrictions include handwashing regimes (as per HSE guide).</p> <p>Water flushing is a constant regime in offices, all contracted and scheduled maintenance of services equipment is continuous. Water sampling has been carried out with negative results (which shows compliance).</p> <p>Appropriate weekday office cleaning is in force, that will be increased as required.</p> <p>Waste disposal now an increased regime for colleagues' protection. Clinical waste disposal bins (for masks, gloves, wipes, tissues, other) installed at offices. Waste bins for non-clinical waste are placed in central areas within teams.</p> <p>Whilst unable to control, it is expected that all colleagues would be aware and respect that they would not return to an office if experiencing COVID-19 symptoms.</p> <p>Colleagues are requested to keep movement around the office to a minimum and are strongly requested by DMG to wear face coverings if moving around the offices. It will be noted that cleaners will be wearing full PPE at this time due to nature of work.</p>
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R2	Spread of COVID-19 to Clients or Visitors in Wrigleys offices	This will result in multiple individuals (Partners, Colleagues, Clients/Visitors, and Contractors) becoming infected and possibly seriously or fatally ill	<p>Any outdoor events to take place following social distancing and limited to 30 people</p> <p>Indoor events (as opposed to a meeting) not to take place</p> <p><b>Reviewed:</b> October 2020: status remains the same. Review in December 2020.</p> <p>Face-to-face meetings discouraged with conference calls to be used instead where practical.</p> <p>Upper limit on meeting numbers determined by available room size and based on social distancing rules</p> <p>Meetings staggered so no congestion possible</p> <p>Seats removed from meeting rooms to ensure physical distancing</p> <p>Enhanced cleaning regime, including before / between / after each individual meeting</p> <p>Sanitation products (hand sanitiser, cleaning wipes) available inside each meeting room</p> <p>No catering/refreshments offered inside meeting rooms</p> <p>Pre-meeting notification (if possible) sent to all attendees asking them to stay away if they have any COVID symptoms in line with Government guidance.</p> <p>Physical distancing in place in reception/waiting area</p>	<p>Status driven by Government guidance to work from home.</p> <p>COVID-19 Contractor Procedure is in place to manage the control and measures for office attendance from a Wrigleys and Contractor organisation perspective. Permit to Work System in place and COVID-19 Statements and Risk Assessments reviewed as and when required.</p> <p>(Internal users - refer to pre meeting notification Wrigleys Intranet Coronavirus – Guidance on Returning to Offices) Clients and Visitors)) refer to pre meeting notification.</p> <p>Electronic conference is the primary meeting media and mode. Microsoft Teams implemented and available to all colleagues.</p> <p>Office meeting rooms available for booking through Operations.</p> <p>Colleagues requesting an on-site meeting, via Operations Team, are directed to a set date/time so a meeting room can be prepared (cleaned, PPE put in place, sanitisers available) before and after each meeting.</p> <p>Clients and other visitors are requested to wear a face mask whilst entering and exiting our offices and in common areas.</p> <p>Greeting clients with a handshake is discouraged.</p> <p>Restricted areas for Client and Visitors to offices has intent of preventing movement through the offices</p> <p>No hospitality is offered at this time aside from bottled water.</p> <p>NHS QR code registration is in place at Wrigleys offices for those wishing to use it. This is intended for clients and external visitors. Colleagues are not prohibited from using it but must also sign in using the methods in R1.</p>

			<p>No cloakroom service – Visitors should look after their own personal items</p> <p>No hospitality – visitors will not be offered hospitality</p>	<p>No cloakroom service available currently.</p> <p>Pens and paper have been removed from meeting rooms.</p> <p>Meeting organiser should make Operations Team aware when meeting has finished so cleaning can be arranged.</p> <p>Signage to maintain social distancing is in place at offices.</p> <p>This section is under constant review pending requests to Operations Team. An increase in occupation levels will lead to more stringent actions being taken.</p>
Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R3	Spread of COVID-19 to Clients or Visitors in external locations	This will result in multiple individuals (Colleagues, Clients, and Third Parties) becoming infected and possibly seriously or fatally ill	Face-to-face meetings discouraged with conference calls to be used instead where practical.	<p>If you are requested to attend a meeting with a Client or visit a Client property, the following steps are recommended:</p> <p>Colleagues should pre assess risk before you visit</p> <p>Take PPE – masks and gloves - if you feel it is appropriate (how to wear PPE <a href="https://www.youtube.com/watch?v=4xFY3aPF7E4">https://www.youtube.com/watch?v=4xFY3aPF7E4</a>)</p> <p>Wash your hands or use hand sanitiser as frequently as possible</p> <p>If you have any questions regarding client visits, please speak to your head of department.</p> <p>If attending commercial premises review the COVID Risk Assessment before the meeting</p> <p>If you feel the risk level increases once you arrive at the meeting location, you should leave the location and take appropriate cleaning actions (personal, documents, other)</p>
Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R4	COVID-19 case (suspected) in Wrigleys office	This may result in the individual colleagues experiencing medical distress on-site and could increase the risk of onward	If anyone becomes unwell with a new continuous cough, a high temperature or loss of sense of smell in the workplace, they will be sent home and advised to follow the stay at home guidance.	Anyone with COVID symptoms or otherwise required to self-isolate (including by a request from NHS Test and Trace) should not come to work and

		<p>transmission of the virus among other people with whom the individual has been in proximity</p>	<p>Anyone with COVID symptoms or otherwise required to self-isolate (including by a request from NHS Test and Trace) should not come to work and should refer to the <a href="#">NHS</a> and government guidance as appropriate.</p> <p>Partners and managers to increase the frequency of electronic contact with those they supervise during this time</p> <p>Majority of people instructed to work from home</p> <p>Maintaining up-to-date contact information (including emergency contacts) for all Partners and Colleagues</p> <p>Record keeping on who is in and where in the office on a given day to aid potential contact tracing efforts and processes - keeping this information as per the Government's guidance.</p>	<p>should refer to the <a href="#">NHS</a> and government guidance as appropriate.</p> <p>Operations Team: inform members of the DMG who determine specific actions; inform other colleagues who have been in close contact and if necessary, colleagues will be asked to stay away from the office and work from home where possible.</p> <p><b>Change:</b> Contact information should be kept up to date. . Sign-in / sign out book in Leeds and the Paxton system in Sheffield.</p> <p>At present, Operations Team as the single point of contact will inform members of the DMG who will lead the response and if required contacting local public health teams</p> <p>Manager and Team Meetings are still scheduled via Microsoft Teams.</p> <p>OCS can carry out deep-clean and disinfection of colleague's work area – when requested as specialised equipment would be required</p>
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R5	COVID-19 transmission via communal resources or areas	This may result in increased risk of transmission, including to / from Clients and Visitors	<p>Marketing material (brochures and literature), newspapers and magazines removed from Reception area</p> <p>Pens, pads, and other stationery removed from meeting rooms.</p> <p>In addition to cleaning regime referenced in R1</p>	<p>Client material has been removed from reception and communal areas. All marketing material is available in the Firm-wide Resources folder in iManage, held under Brochures.</p> <p>Hand sanitiser should be used before and after handling library books, paper files and deeds.</p> <p>Print release will be the recommended setting for all printers</p> <p>The sharing of cutlery or crockery is not permitted. It is your responsibility to make your own drinks and clean and retain any crockery or cutlery you use. You should not leave dirty crockery in kitchens or dishwashers.</p> <p>Follow signage in all communal areas and follow social distancing advice.</p> <p>In Leeds office avoid transfer through General Office when using Basement kitchen.</p> <p>Shower areas were deemed as closed, and that has now been amended. Refer to specific requirements per office, and signage. Further reviews as new guidance is received.</p>
Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R6	COVID-19 transmission via mail/packages	This may result in increased risk of transmission by handling of objects.	Follow hand hygiene guidance before and after handling mail/packages	<p>General office colleagues are working weekday within offices to manage deliveries and despatch of mail and packages.</p> <p>No personal deliveries should be made to the office for the time being.</p> <p>General Office areas are high contact points in both offices. You are required to wear a face mask if you are in the vicinity of General Office.</p> <p>New COVID-19 Equipment procedure for instruction for removing or returning equipment to the office. Refer to Wrigleys Intranet (Coronavirus – Returning equipment from the office). Procedure covers colleagues requiring to remove / return chairs, other, for home use.</p> <p>Quarantine areas have been setup in offices</p>

Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R7	Mental health problems and poor wellbeing	<p>This may result from increased stress caused by home-working and the lockdown, potential bereavements, increased caring responsibilities, elevated incidence of anxiety and depression associated with isolation, concerns about personal and family circumstances and job security</p> <p>Colleagues of BAME background and those with family members who are key workers may feel more uncomfortable coming back into the office</p>	<p>Signpost to <a href="#">LawCare resources</a> and the <a href="#">Law Society's mental health resources</a> (open in Google Chrome browser)</p> <p>Increase volume of guidance materials and resources available</p> <p>Raise awareness on any Employee Assistance Programme (EAP) offering access to additional resources and support</p> <p>Adjust policies around home working and leave taking to support working parents</p> <p>Regular internal communications from senior leadership emphasising self-care and regular and inclusive communication. The emphasis should also be on honesty and transparency about the difficulties the firm is facing and how to best manage these together</p> <p>Regular communication of mental health information and an open-door policy for those who need additional support</p> <p>Provide assurance over measures taken to protect employees' health and safety</p>	<p>Wrigleys have a strong awareness and focus on presenting assistance and information to colleagues on mental health and wellbeing.</p> <p>Wellbeing thread created on Microsoft teams with content on physical, mental, emotional, and financial wellbeing posted daily.</p> <p>Specific COVID-19 updates and contacts are ongoing.</p> <p>Operations Team issue timely updates and information on mental health including reminders of our EAP</p> <p>Home working policy under review with SHRC</p> <p>DMG provide regular updates on the position of the firm. Updates also provided at Partners' meeting once a fortnight for discussion at team meetings.</p> <p>Mental Health consideration apply in leave taking and furlough.</p> <p>Ongoing situation that is reviewed and managed by Senior colleagues and Operations Teams.</p> <p>Supported by health and safety, and duty of care, measures being taken as referenced in this document to ensure colleagues are supported and limits anxiety and concerns regarding a return to work in Wrigleys offices.</p> <p>OCS – Wrigleys Solicitors (Leeds &amp; Sheffield) awarded RoSPA Silver Award for 2020</p>

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R8	Ergonomic injuries	<p>Insufficient chairs, screens, footstools, desks etc. may be available in the office - as a proportion of these could have been taken home by colleagues</p> <p>Not having your homeworking station set up correctly.</p> <p>It may be difficult to perform workspace risk assessments whilst maintaining physical distancing or if colleagues sit in different locations each time, they are in the office</p>	<p>Virtual self-administered workplace risk assessment <a href="https://www.youtube.com/watch?v=Af7q5j14muc">https://www.youtube.com/watch?v=Af7q5j14muc</a></p> <p>Follow HSE guidance on working from home <a href="https://www.hse.gov.uk/msd/dse/">https://www.hse.gov.uk/msd/dse/</a></p> <p>Where possible, people to be asked to bring their more portable ergonomic equipment (such as keyboards, wrist supports or mice) with them when working in the office</p>	<p>Colleagues requested to send to Operations completed home working risk assessments and photograph of their home working set up.</p> <p>Colleagues can contact Operations Team who will organise further DSE checks on home setup with Jason Hall (OCS).</p> <p>New procedure for removal of equipment from offices and return of equipment will control locations and possible Return to Work issues. Refer to Wrigleys Intranet (Coronavirus – Returning equipment from the office).</p>
Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R9	Public transport virus transmission	Possibility of crowded and unsanitary conditions on public transport services.	If Colleagues need to travel (for example for Client visits) they should follow government guidelines.	<a href="https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers">https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers</a>
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R10	Car / Bike park virus transmission	Narrow spaces in the firm's carpark or bicycle storage area may elevate the risk of person-to-person transmission	Social distancing procedures should be followed	<p>Limitation restrictions already apply in offices as there are few parking spaces available. If colleagues observe social distancing this should not be an issue. PPE is available if a requirement.</p> <p>Bicycle storage areas that are available would need colleagues to observe social distance and common sense to not interact within these specific limited areas. Issue of PPE is available if social distancing is not possible or compromised.</p> <p>Colleagues are requested to inform Operations Team if they will travel by bike to a Wrigleys office or if they require use of the showers.</p>



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R11	Safety and security at building entrance	There is a small risk that individuals may have to wait for short periods of time at building entrances due to physical distancing	Staggered arrival times for those attending the office should limit congestion	<p>If colleagues report issues or incidents at office entrances then that will be reviewed, and responsible actions taken</p> <p>Required signage and posters in place for colleagues' direction and advice.</p> <p>Inter-office travel and procedures will need to be reviewed and appropriate actions determined.</p>
Risk No.	Risk title	Description and consequence	Mitigation	Response and Action
R12	COVID-19-related stigma and harassment	Risk that there is an increase in targeted harassment or stigma directed at individuals who have been ill or are from a specific ethnic background	<p>Reporting channels to permit investigation and where proven appropriate misconduct procedures followed</p> <p>Partners and Managers to offer support to colleagues who are affected by COVID-19 or have a family member affected</p> <p>Review the organisation's bullying and harassment policy and remind Managers of it</p> <p>Publish or signpost colleagues to facts about COVID-19 to dispel myths</p> <p>Ensure senior figures in the organisation issue and support messages about values and diversity and inclusion</p>	<p>Wellness channel discusses own experiences to reduce stigma of COVID-19</p> <p>Bullying and harassment policy in place should anyone feel negativity directed to them due to COVID-19.</p> <p><a href="https://www.who.int/emergencies/diseases/novelcoronavirus-2019/advice-for-public/myth-busters">https://www.who.int/emergencies/diseases/novelcoronavirus-2019/advice-for-public/myth-busters</a></p>

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R13	Non-compliance with government regulations or guidance	Risk that a Wrigleys colleagues ignores guidance	<p>Communicate the importance of the adherence to the rules.</p> <p><b>Change</b> It is now a legal obligation to inform your employer if you are self-isolating and due to attend one of our offices or another location (e.g client meeting or a clients home). Failure to do so could lead to a fine and a criminal record.</p> <p>If you are still concerned that your employer is not taking all practical steps to promote social distancing then you can report this to the local authority or the Health and Safety Executive.</p>	<p>Wrigleys DMG meet regularly – to discuss and review the COVID-19 situation as it evolves; react to any change in circumstances occurring within the firm, ensure the firm colleagues are always updated and informed.</p> <p>Wrigleys actions are all based on any changes introduced to comply with:</p> <ul style="list-style-type: none"> <li>Government advice</li> <li>HSE guidelines</li> <li>Wrigleys Duty of Care</li> <li>Regulatory Bodies' advice</li> </ul> <p>Colleagues informed of personal responsibility, changes to the office, etiquette, guidelines, working instructions and obligations. All standard policies apply.</p> <p>Additional for COVID-19 related procedures introduced – COVID-19 Contractor procedure, COVID-19 Equipment procedure. Refer to Wrigleys Intranet – Coronavirus.</p> <p>Wrigleys maintain this Risk Assessment by continuous review as changes/advise is introduced by Government and HSE; attendance at COVID-19 webinars presented from industry sector and preferred contractors; in-house received information or publications; direct information from OCS Group UK Ltd and within their specialised key sectors.</p> <p>In addition, all actions taken by Wrigleys aims to comply with the Institution of Occupational Safety and Health (IOSH) to support a return to the office safely. IOSH has produced information on returning safely to work, setting out four areas to consider: safe people, safe systems, safe workplaces, and safe equipment, being the same as this risk assessment duty of care criteria.</p> <p>First Aid boxes in offices have been stocked with PPE masks and gloves. First Aiders have been issued with Face Guards and Aprons.</p>

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R14	Impact on 'protected' characteristics	<p>Be aware of the impact measures you are taking might have on protected characteristics and take appropriate action to mitigate that impact.</p> <p>Examples 1: new traffic flows through the building may affect accessibility.</p> <p>Example 2. what might the impact be on those who are pregnant or new mothers.</p>	<p>Liaise with staff to inform the measures you are taking.</p> <p>Refer to best practice guidance available through various sources including the Law Society and other bodies.</p>	<p>Adaptations may need to be made for particular individuals who should contact Operations if they feel it is necessary.</p>
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R15	Disclosure of personal data held by Wrigleys	<p>Risk of improper disclosure or other noncompliance of client/visitor details.</p> <p>Misuse of personal information where a colleague visited other premises.</p>	<p>Follow ICO guidance, collecting and holding minimal information.</p>	<p>Information collected should be adequate and relevant.</p> <p>Colleagues who visit other premises should give work phone numbers not personal phone numbers.</p> <p>Needs to be kept secure to minimise the risk of accidentally losing or destroying it.</p> <p>Wrigleys will keep only for as long as needed, then destroy correctly.</p>
<b>Risk No.</b>	<b>Risk title</b>	<b>Description and consequence</b>	<b>Mitigation</b>	<b>Response and Action</b>
R16 New Risk Identified	Increased incidence amongst Wrigleys colleagues and/or heightened community transmission	<p>Risk of transmission of virus by colleagues who are not presenting Covid specific symptoms but are unwell</p>	<p>Everyone who can work from home should do so. If you are on a rota to attend the office, we ask that you do not attend.</p>	<p>If colleagues are feeling unwell but not presenting recognised Covid symptoms, we ask they make operations aware and work from home if they are well enough.</p> <p>For colleagues who cannot work from home please speak to operations.</p> <p>If colleagues are not well enough to work, please follow the standard sickness absence reporting policy.</p>