

Risk Assessment: RA10

COVID-19 Safer Working Practices: Enforcement Agents and Field Operations

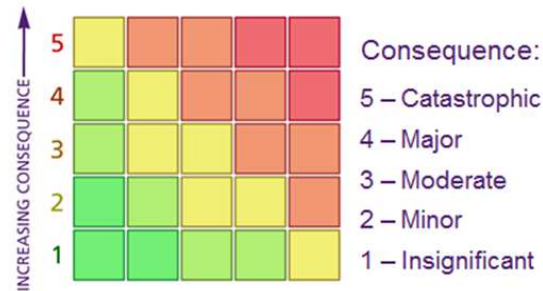
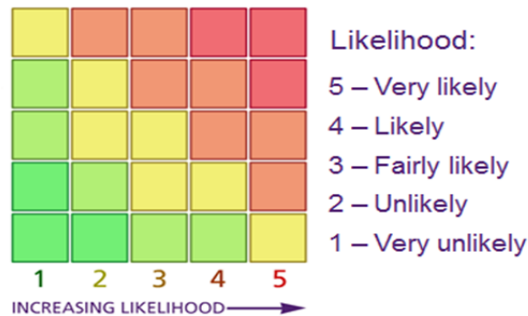
Owner: Amy Collins
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Fair.
Effective.
Intelligent.
Rundles.

Persons Affected

- Employees
- Sub-Contractors
- Customers
- General Public
- Enforcement Agents

Risk Scoring Methodology



1 to 4	Minimised	5 to 8	Acceptable	9 to 15	Improvement	16 to 25	STOP IMMEDIATELY
No further action monitor and review.	Consideration should be given as to whether the risks can be lowered, but the costs of additional risk reduction measures should be considered. Reduction measures should be implemented within defined period.	Significant efforts should be made to reduce risk. Risk reduction measures should be implemented urgently within defined time period. Consider suspending or restricting the activity or apply interim risk control measures. Considerable resources might have to be allocated to additional control measures.				STOP. Significant improvements in risk control necessary to reduce risk to acceptable level. Do not proceed until additional controls implemented.	

1.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Enforcement Agents display COVID-19 symptoms.</p> <p>Enforcement Agent in contact with symptomatic customer, member of public, or colleague.</p> <p>Risk to individual and public health, cross contamination, and virus spread.</p>	3	4	12	<p><i>(Apply to all risks within Risk Assessment)</i></p> <p>Training and guidance video developed, shared with/used by CIVEA. All Enforcement Agents required to undertake detailed COVID-19 training prior to duty recommencement.</p> <p>Documentation, guidelines, and training deployed to all Enforcement Agents (and all staff) detailing COVID-19 symptoms, risk mitigation measures, and actions to take (self-isolation, reporting etc.) where symptoms present.</p> <p>Self-declaration procedure implemented. Enforcement Agents must send daily message to Enforcement Manager, confirming they and their household are symptom free.</p>	1	4	4	<p><i>(Apply to all risks within Risk Assessment)</i></p> <p>a) Central Enforcement Support teams on duty during all hours when Enforcement Agents are in-field. Duty Director available for emergency/senior-level escalation.</p> <p>b) Dedicated Audit Team implemented additional audit checks. Ensure adherence to COVID guidance and revised working practices.</p> <p>Enhanced audit/sampling of body-worn video, call recordings, complaints, escalations, case notes etc.</p> <p>Where non-compliance, immediately report to Management (address with employee, implement rectification action/training etc.)</p>	<p>a) B McGuire: COMPLETE</p> <p>Duty Director: ONGOING</p> <p>b) B McGuire: ONGOING</p>

			<p>Where symptoms present (personally or household member), Enforcement Agent must immediately self-isolate, order and submit test via NHS test and trace (ordered via NHS website), and follow advice of NHS test and trace.</p> <p>Staff to follow NHS test and trace instruction (e.g. self-isolation where contact with symptomatic customer, providing GDPR compliant details of recent contacts where Enforcement Agent or household member symptomatic).</p> <p>Enforcement Agent shift records to be retained (21 days).</p> <p>Face covering and additional PPE issued to Enforcement Agents, minimising risk of virus spread (see PPE detail below).</p> <p>Ongoing communication with all Enforcement Agents providing latest updates from Public Health England (PHE), NHS, and clients (area specific issues e.g. local lockdowns).</p>			<p>c) Shift and visit records to be retained (21 days)</p>	<p>c) D Davison: ONGOING</p>
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2.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Risk of exposure to COVID-19 through public transport.</p> <p>Risk of cross contamination through sharing of vehicles.</p> <p>Contamination or exposure from frequently touched areas (keys, steering wheel, gear sticks, indicators, controls, door handles etc).</p>	3	4	12	<p>Enforcement Agents provided with guidance on safe travel and vehicle usage.</p> <p>Risk minimised, public transport not used during field operations. Enforcement Agents advised to avoid public transport outside working hours.</p> <p>Enforcement Agents required to travel alone to complete visits; if not possible (by exception):</p> <ul style="list-style-type: none"> Vehicles to be shared with same individuals, and minimum number of people at one time. Occupants to wear face coverings, and vehicle ventilated as much as possible (windows open). Vehicles to be cleaned extensively using appropriate cleaning products (guidelines issued); particular emphasis on handles, 	1	4	4	<p>a) Additional MOJ guidance (21st August) shared with Enforcement Agents.</p> <p>b) Revised guidelines and requirements (CIVEA, MOJ, PHE, NHS, clients etc.) to be issued on publication.</p> <p>c) Revisions to working practices issued to all Enforcement Agents.</p>	<p>a) A Collins: COMPLETE</p> <p>b) B McGuire: ONGOING</p> <p>c) B McGuire: Aug 2020</p>

			<p>seat belts, seats, controls, and all surfaces which may be touched. Gloves to be worn during cleaning, and disposed of securely (guidelines issued).</p> <ul style="list-style-type: none"> ▪ Hand sanitiser to be used by all occupants prior to entry, and immediately on leaving vehicle. ▪ Enforcement Agents required to wear gloves when refuelling. ▪ Hand sanitiser (provided) must be used frequently throughout the day. 				
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3.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Potential of Enforcement Agents encountering customers adversely impacted by COVID-19.</p> <p>Increased financial difficulty and hardship.</p> <p>Additional adverse impact on customers health and wellbeing.</p>	5	4	20	<p>Training includes extensive modules concerning management/identification of vulnerability cases, and compliance with MOJ: National Standards for Enforcement Agents, CIVEA Code of Conduct etc.</p> <p>All documentation, website etc. provides clear signposting to advice organisations.</p> <p>Pre-visit activity, where permitted by clients, has encouraged contact from customers. Outbound communication content revised to include further promotion of support channels, and our willingness to work with customers and help manage debt/personal issues.</p> <p>Our Fairness Framework focuses on procedures to identify/support vulnerable customers. Dedicated Welfare Team manage all cases of vulnerability, working with vulnerable</p>	3	4	12	<p>a) SMS, emails and letters issued to advise customers that visits have recommenced, and requesting urgent contact if displaying symptoms / shielding.</p> <p>b) Additional MOJ guidance (21st August) shared with Enforcement Agents.</p> <p>c) Revised guidelines and requirements (CIVEA, MOJ, PHE, NHS, clients etc.) to be issued on publication.</p> <p>d) Revisions to working practices issued to Enforcement Agents.</p> <p>e) Dedicated Audit Team implemented additional audit checks. Ensure adherence to COVID-19 guidance and revised working practices.</p> <p>Enhanced audit/sampling of body-worn video, call recordings,</p>	<p>a) A Collins: 24 August</p> <p>b) A Collins: COMPLETE</p> <p>c) B McGuire: ONGOING</p> <p>d) B McGuire: August 2020</p> <p>e) B McGuire: OOGOING</p>

			<p>customers to agree circumstance-based recovery strategies to support each individual (outside 'standard' collection processes).</p> <p>OneStep recovery systems enables accurate and consistent recording of customers identified as potential/confirmed vulnerable. Cases placed on hold to provide breathing space, and extended payment/arrangement terms as appropriate.</p> <p>Where vulnerability confirmed, Welfare Team remove/refund Enforcement Stage fee (engage clients in-line with specification requirements).</p>			<p>complaints, escalations, case notes etc.</p> <p>Where non-compliance, immediately report to Management (address with employee, implement rectification action/training etc.)</p> <p>Failure to apply vulnerability procedures classified as a 'Major Fail' and EA subject to suspension of activity, retraining or removal.</p>	
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4.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when attending customer properties.</p> <p>Risk to Enforcement Agents and others.</p> <p>Poor hygiene.</p> <p>Contact with others.</p> <p>Use of lifts, handrails, and frequently touched areas.</p>	3	4	12	<p>Enforcement Agents prompted, and required to review case notes prior to leaving vehicle to conduct visits. Verify no intelligence received relating to customer exhibiting COVID-19 symptoms.</p> <p>Immediately on engaging customer, Enforcement Agents required to confirm no COVID-19 symptoms present within household (withdraw if symptoms present/claimed).</p> <p>OneStep configured to enable specific COVID-19, shielding and key worker classification</p> <p>PPE provided to Enforcement Agents, supported by video training/guidance. New Enforcement Agents will not be deployed into field until completed CIVEA approved training, and issued with appropriate PPE.</p>	1	4	4	<p>a) Reconnection communications issued providing customers with advance notice of visit if contact / payment not made.</p> <p>b) Pre-visit correspondence amended to specifically reference COVID-19 and need for customers to make contact to avoid visit.</p> <p>c) Additional shielding / COVID-19 specific SMS and email to be issued. Confirms to customers all visits for first 30-days will be non-contact, and Enforcement Agents will not enter residential premises.</p>	<p>a) A Collins: COMPLETE (existing cases). ONGOING (new cases or on-hold at client request)</p> <p>b) A Collins: COMPLETE</p> <p>c) J Jackson Gray: ONGOING</p>

		<p>Gloves to be worn where likelihood of contact with hard surfaces including doors, doorbells, gates etc.</p> <p>Personal hygiene controls introduced. Enforcement Agents must use alcohol-based hand sanitiser before exiting vehicles, before and after visits, and ensure all equipment cleaned with antibacterial wipes.</p> <p>Social distancing measures implemented. Enforcement Agents must conduct dynamic risk assessment at start of each visit, and adhere to social distancing (2m distance from others, 1m+ with appropriate PPE).</p> <p>Enforcement Agents provided with specific COVID-19 training/guidance on safe working practices, including how to safely knock on door, use of lifts and contact with frequently touched areas.</p> <p>Intelligence gathering by Enforcement Agents required to confirm that social distancing will be maintained by the customer and others.</p>		<p>d) Visits to business premises, will follow COVID-19 guidelines.</p> <p>e) Cases where customers have advised of shielding, self-isolation and/or COVID-19 related symptoms have been, and will be placed on hold to prevent visit (7 days for provision of evidence, 14 days to reflect isolation).</p>	<p>d) D Davison: ONGOING</p> <p>e) C Gelsthorpe: ONGOING</p>
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5.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when taking payment.</p> <p>Risk to enforcement agents and others.</p> <p>Shared equipment (payment devices)</p> <p>Possible risk of cross contamination from the user of paper (letters, receipts)</p>	2	4	8	<p>Cash payments avoided wherever possible.</p> <p>Enforcement Agents must comply with social distancing, remaining 2m away from customer and others, reducing to 1m+ with appropriate PPE.</p> <p>PPE must be worn and ensure adherence to safe working practices.</p> <p>Contactless payments will be taken by Enforcement Agents vis Rundles 'EA Bureau line'.</p> <p>Receipts issued by email only. Use of hardcopy paperwork avoided wherever possible.</p>	1	4	4	<p>a) SMS, emails and letters issued to advise customers that visits have recommenced, and requesting urgent contact if displaying symptoms / shielding, and to avoid visits.</p> <p>b) Additional MOJ guidance (21st August) shared with Enforcement Agents.</p> <p>c) Revised guidelines and requirements (CIVEA, MOJ, PHE, NHS, clients etc.) to be issued on publication.</p> <p>d) Revisions to working practices issued to Enforcement Agents.</p> <p>e) Dedicated Audit Team implemented additional audit checks. Ensure adherence to COVID-19 guidance and revised working practices.</p> <p>Enhanced audit/sampling of body-worn video, call recordings,</p>	<p>a) C Gelsthorpe: 24 August</p> <p>b) A Collins: COMPLETE</p> <p>c) B McGuire: ONGOING</p> <p>d) B McGuire: August 2020</p> <p>e) B McGuire: ONGOING</p>

						<p>complaints, escalations, case notes etc.</p> <p>Where non-compliance, immediately report to Management (address with employee, implement rectification action/training etc.)</p> <p>Failure to apply vulnerability procedures classified as a 'Major Fail' and EA subject to suspension of activity, retraining or removal.</p> <p>f) Amended payment arrangement policies introduced to provide customers with longer periods for repayment.</p>	<p>f) A Collins: COMPLETE</p>
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6.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when communicating and recording evidence.</p> <p>Increased risk of transmission due to raised voices.</p> <p>Risk to Enforcement Agents and others.</p>	2	4	8	<p>Existing training modules cover the need for calm and effective management of verbal communication with customers.</p> <p>All EAs issued with Body Worn Video.</p> <p>Enforcement Agent required to ask resident/customer to take pictures of relevant evidence and send via email to Rundles Customer Care.</p> <p>If customer does not have capability to do this, Enforcement Agents required to ask customer to place evidence on doorstep and step back, Enforcement Agent can then take and upload picture of evidence.</p> <p>PPE and safe working practices guidance issued.</p>	1	4	4	<p>a) Additional MOJ COVID-19 guidance issued to all Enforcement Agents with regards to risks of raised voices.</p> <p>b) Enforcement Agents specifically advised to avoid engaging in situations where voices could be raised, and should retreat from premises if this occurs.</p> <p>c) All Enforcement Agents specifically advised to withdraw from premises where customer claims COVID-19 symptoms (personally or within household).</p> <p>d) All Enforcement Agents received welfare, vulnerability, and safeguarding training.</p> <p>e) Monitor conformance with correspondence/evidence procedures. Report failures to Enforcement Operations.</p>	<p>a) B McGuire: COMPLETE</p> <p>b) D Davison: COMPLETE</p> <p>c) D Davison: COMPLETE</p> <p>d) B McGuire: COMPLETE</p> <p>e) C Gelsthorpe: ONGOING</p>

7.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when clamping a vehicle</p> <p>Risk to Enforcement Agents and others.</p> <p>Risk of possible interference when fitting the clamp.</p>	1	4	4	<p>Enforcement Agents required to apply hand sanitiser prior to applying gloves.</p> <p>Whilst fitting clamp, Enforcement Agent must maintain 2m distance from others, if unable to do so, withdraw safely in accordance with guidance.</p> <p>Once fitted Enforcement Agent must clean clamp with disinfectant spray to minimise risk to others.</p> <p>When removing clamp, Enforcement Agent must utilise PPE including gloves, adhere to social distancing and disinfect clamp before returning it to vehicle for storage.</p>	1	4	4	<p>a) Outbound letters, calls, SMS and emails throughout period leading to restart (and continuing), have minimised number of cases where clamping of vehicle considered.</p> <p>b) Monitor Body Worn Video to identify instances of non-conformance. Raise non-compliance with EA Manager for subsequent investigation/corrective action.</p>	<p>a) J Jackson Gray: ONGOING</p> <p>b) B McGuire: ONGOING</p>

8.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure of Enforcement Agent to COVID-19 when returning to vehicle and preparing for next visit.</p> <p>Risk of cross-contamination.</p> <p>Risk of incorrect PPE storage.</p>	2	4	8	<p>Enforcement Agents issued with safe working practices guidance and are required to maintain social distancing when returning to their vehicle.</p> <p>Enforcement Agents must remove PPE prior to re-entering vehicle in accordance with safe removal and disposal guidance.</p> <p>Hand sanitiser must be re-applied before entering vehicle.</p> <p>Reusable PPE must be stored correctly. Gloves and face masks to be disposed of, face shields/visor to cleaned and returned to storage sleeve.</p> <p>All equipment must be re-cleaned with antibacterial wipes.</p> <p>Any incidents of additional intelligence gathered (i.e. debtor or family member in self-isolation) must be reported.</p>	1	4	4	<p>a) Monitor body Worn Video to identify non-conformance. Raise failures with Enforcement Manager.</p>	<p>a) B McGuire: ONGOING</p>

9.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when entering customer premises.</p> <p>Risk to Enforcement Agents and others.</p>	3	4	12	<p>Enforcement Agents should establish from distance if entry to property required. Dynamic risk assessment to be conducted. Entry arrangements to be discussed (at distance) with householder. PPE must be worn. Risk mitigation steps may include:</p> <ul style="list-style-type: none"> ▪ Social distancing. ▪ Minimising contact with other householders. ▪ Minimising physical contact with surfaces. ▪ Keep interactions to well-ventilated areas. ▪ Maintain hygiene practices. <p>COVID-19 specific training provided all staff and Enforcement Agents, providing clear guidance on risks, revised practices, and mitigation strategies</p> <p>Enforcement Agents must follow revised practices:</p>	1	4	4	<p>a) Pre-visit correspondence (SMS, email and letter) issued, advising customers that visits recommenced, encouraging engagement to avoid visits, and requesting urgent contact if symptoms/shielding.</p> <p>b) MOJ guidance regarding visits at residential premises shared with Enforcement Agents.</p> <p>c) Monitor Body Worn Video to identify non-conformance. Where identified, report to Enforcement Manager for investigation and corrective action.</p>	<p>a) C Gelsthorpe: COMPLETED</p> <p>b) B McGuire: COMPLETED</p> <p>c) B McGuire: ONGOING</p>

			<ul style="list-style-type: none"> ▪ Social distancing (1m+ with appropriate PPE). ▪ Visits to business premises to follow COVID-19 guidelines and measures necessary/required by business to maintain safety. ▪ Wipe vehicle frequently touched internal areas and handles with antibacterial wipes. ▪ Clean work boots with antibacterial spray/wipes, leave boots in vehicle following duty. ▪ Apply hand sanitiser before entering home. ▪ Following duty, remove clothing, wash as soon as possible (60-degree wash). Wash hands, arms, and face as soon as possible. <p>Enforcement Agents must self-isolate if they, members of household, or recent contacts symptomatic.</p> <p>Reporting, testing, and NHS test and trace instructions/procedures (above) to be followed without exception.</p>			
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Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
Potential adverse impact on mental health of Enforcement Agents.	2	3	6	<p>Support system in place by Human Resources.</p> <p>Regular contact with managers to discuss areas of concern or opportunities for improvements.</p> <p>Referrals to Rundles First Aider for mental health, and external agencies.</p>	2	2	4	a) Monitor and review	a) B McGuire: ONGOING



11.

Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 (General).</p> <p>Inability to maintain social distancing.</p> <p>Poor Hygiene.</p>	4	4	16	<p>Enforcement Agents issued with guidance on safe use of PPE, including correct donning and doffing process to minimise self-contamination.</p> <p>All Enforcement Agents supplied with:</p> <ul style="list-style-type: none"> Hand Sanitiser (alcohol based minimum 70%). Nitrile Gloves - Recommended EN 374-5 certified; nitrile material offers tear resistance, strength and longevity, easy to throw away. Face Coverings. <p>Enforcement Agents reminded of importance of social distancing.</p> <p>Enforcement Agents must remain 2m distance from others wherever possible, 1m+ with PPE.</p> <p>Face to face communication minimised where possible. Communication with</p>	1	4	4	As above.	As above.

			<p>customers attempted via SMS, phone, and email.</p> <p>Avoidance of populated areas, Enforcement Agents should not visit local shops during operational hours.</p> <p>Enforcement Agents must check for regular guidance on website including gov.uk, PHE, and NHS.</p> <p>Enforcement Agents must:</p> <ul style="list-style-type: none"> ▪ Wash hands regularly for 20 seconds with warm water and soap or use hand sanitiser provided, and always avoid touching face. ▪ Hands must be sanitised upon arrival at customer premises, prior to leaving vehicle, and before re-entering vehicle. ▪ Follow 'Catch It, Bin It, Kill It' guidance to catch coughs and sneezes. 			
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			<ul style="list-style-type: none">Frequently clean equipment, to be disinfected before and after use.				
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Hazards	L	C	R	Controls	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 (specific high-level risks).</p> <p>Risk of Enforcement Agent deliberately exposed (e.g. spat or coughed at) by someone threatening to have the virus.</p>	3	4	12	<p>Guidance provided on how to withdraw from visit, and minimise of exposure (adopting safety controls).</p> <p>Incident reporting system in place.</p> <p>Case notes updated to share risk intelligence.</p> <p>PPE (above) issued.</p> <p>Enforcement Agents report symptoms/confirmed cases in contact with.</p> <p>Investigation conducted following exposure during operations. Risks addressed. Report a RIDDOR if required.</p> <p>Clean working areas (vehicles) and equipment.</p>	2	4	8	<p>a) Support to manage potential impact of such risk on Enforcement Agents mental health.</p> <p>b) Monitor Body Worn Video to identify and report incidents</p>	<p>a) B McGuire: Aug 2020</p> <p>b) C Gelsthorpe: ONGOING</p>

			On-going Human Resources support.				
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ISO 9001
ISO 14001
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