



**Risk assessment – HRAC Re-opening following COVID-19 closures
Nov 2020**

Please note: All the risks considered in this risk assessment are deemed ‘very high’ by the organisation. As such, all controls listed to mitigate against the risks are deemed equally high priority and must all be in place before the HRAC reopens. We will regularly review our assessment in line with experience and any guideline changes – weekly for the first month, and regularly thereafter.

Location/Dept: HRAC	Date Assessed: 25.11.20	Assessed by Robert Shuster
Task/Activity: HRAC return to work	Review Date: 25.11.20	Reference Number: 17

Activity/ Task	Hazard/Risk	Persons at Risk	Control measures in place	
Planning and Homeworking			<ol style="list-style-type: none"> Every reasonable effort to continue working from home (WFH) should continue for those roles where it is possible. No one is expected to come into the office until April 2021 at the earliest, and this will be kept under review Based on the Government statement on 24.11.20 re: the end of the month-long national lock-down, from Wednesday 2nd December the HRAC will open as it was before the current lockdown period. As a reminder, the office is open for: <ul style="list-style-type: none"> Those who need to be in the office to deliver their role Those who need to use the office for their wellbeing Any staff member who fits either of those criteria must check with their line manager, who will ensure your name is on the centrally held list in order that we can manage the numbers of office attendance. There will be a maximum of 20 people in the HRAC on any given day. 	

			<p>3. All other staff must work from home. Where staff are required to come into the office, please see guidance below and in following pages.</p> <p>4. As this is now a longer-term measure, a formal home working e-learning platform and support is available on MS teams 'Homeworking Info' page.</p> <p>5. AIUK is making every effort to keep in touch with home workers on their working arrangements, providing equipment for people to work from home safely and effectively, and providing remote access to work systems.</p> <p>6. All staff are required to complete on-line Temporary home-workers training on various subjects' areas of homeworking, including health and safety and workstation set up</p> <p>7. All staff will have access to a virtual ergonomics assessment if required to provide them with additional support in their home working setup</p> <p>8. Amnesty is currently working to a plan for minimum numbers of staff on site, whilst being able to operate safely and effectively. During the period December 2020 to April 2021 a maximum of 20 people plus 5 contractors, will be allowed into the office on any given day. The figure of 25 people will be kept under review.</p> <p>9. AIUK is making every effort to monitor the well-being of people who are working from home including their welfare, mental and physical health and personal security. The staff wellbeing group meets regularly to discuss needs and any issues. Line managers receive a weekly email from HR reminding them of responsibilities and things to think about. Regular emails to line managers, and weekly emails to all staff to keep them connected with the organisation</p>	
Travel	Contracting of Covid 19 whilst travelling	Employees Contractors Visitors	<p>1. People should travel to the office safely and follow guidance if using public transport (E.g. TFL guidelines in London). Staff are encouraged to make alternative travel arrangements if possible and to cycle, walk or drive to work, however the HRAC car park</p>	

	Local lockdowns		<p>will not be used as a staff car park. Staff need to be prepared to use and pay for local car parking options.</p> <ol style="list-style-type: none"> Staff should wear face coverings on public transport, use hand sanitiser and practice social distancing. Extended working hours to allow people to travel outside of rush hour. Please see Government guidance on local COVID Alert levels. https://www.gov.uk/coronavirus Local COVID alert levels: what you need to know: https://www.gov.uk/guidance/local-covid-alert-levels-what-you-need-to-know?priority-taxon=774cee22-d896-44c1-a611-e3109cce8eae If London moves to level Tier 3: Current Government guidance suggests that offices can remain open. Therefore, the HRAC would remain open as the HRAC is Covid-secure. We would however keep the situation under review and follow local restrictions at the time, However, do note that if there is another national lockdown, we would expect to close the office. 	
Amnesty Book Shops Working in the office	Symptomatic spread of COVID 19 (behavioural)	Staff Volunteers Customers Employees Contractors Visitors	Amnesty Book Shops Staff / Volunteers / Customers <ul style="list-style-type: none"> Full Risk assessments for Amnesty Book shops available upon request. Contact: Retailmanager@amnesty.org.uk Our shops will reopen on or after 2 December 2020, and are able to remain open under all tiers, subject to staff and volunteer capacity. Suspected and Confirmed case procedure and Comms Suspected Case: <ul style="list-style-type: none"> Anyone displaying symptoms is required to go home, self-isolate and contact the NHS 111 service to arrange for a Covid-19 test. They should not return to the office until they 	

			<p>get a negative test result. Please follow Government guidance:</p> <ul style="list-style-type: none"> • If someone who has been in the office develops symptoms, then everyone else who has been working in the office will be informed. It will be up to each individual concerned whether or not they wish to return to the office while we await the result of the test. • NHS guidelines state you do not need to self-isolate unless you show symptoms. • If you have not been contacted by the NHS to do so you do not need to self-isolate • If you do feel unwell or develop symptoms, please notify Facilities immediately and contact NHS111 and seek clinical advice. • Staff member who shows symptoms will be asked to provide a list of those colleagues they have come into close contact with. • We would encourage employees to tell anyone they have been in close contact with. • We will then await results of the Covid test • If test is positive, Facilities to communicate to staff. Staff member to self-isolate and seek clinical advice from NHS 111. • If the test is negative everyone who has been in the office will be told, and normal working practices can resume. • The area the staff member works in will be disinfected. • If we have more than one suspected case AIUK will contact the local health protection team who will need to investigate. • RIDDOR Reporting: Facilities would investigate the incident and then report to HSE on their website. The HSE decide whether it is RIDDOR, they will then delegate it to a HSE officer if they deem incident to be RIDDOR reportable. <p>Confirmed Case:</p> <ul style="list-style-type: none"> • In the event of a positive test result AIUK will adopt the following procedure. 	
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			<ul style="list-style-type: none"> • Require the individual to go home and self-isolate (if not already doing so), following government guidance. • Individual to contact the NHS 111 service and follow their instructions. A decision based on what the NHS state, i.e. recover from the symptoms before staff can return to work, will then be made. Please follow Government guidance: • Individual who has tested positive will be asked to provide a list of those colleagues they have come into close contact with. • Anyone who is contacted by NHS Test and Trace would also be required to self-isolate. • Please see here for government guidance on how Test and Trace is working: https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works • Facilities will inform Director of Corporate Services, The IRT (Incident Response Team), the team manager of the staff member, Internal Comms & SMT • AIUK will not give out any names of anyone who receive a positive test. • AIUK Comms will notify all staff that there has been a confirmed case, the last day the individual was in the office; and we will let staff know when the office can be safely reopened. • As everyone is required to socially distance when in the office, we would not expect that anyone in the office would be required to self-isolate. We are careful to follow current NHS guidance, which states that unless you're contacted by Test and Trace, or you're also showing symptoms, you would not need to self-isolate. • Anyone who does feel unwell or develop symptoms, is required to notify Facilities immediately and contact NHS111 and seek clinical advice. • The area the staff member works in will be disinfected. • Any staff in the office will be sent home. Office closed. 	
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			<ul style="list-style-type: none"> • A full Clorox deep-clean for the HRAC will be deployed at the earliest possible opportunity • If we have more than one suspected case AIUK will contact the local health protection team who will need to investigate. • RIDDOR Reporting: Facilities would investigate the incident and then report to HSE on their website. The HSE decide whether it is RIDDOR, they will then delegate it to a HSE officer if they deem incident to be RIDDOR reportable. • Communication and training materials provided for employees prior to returning to site, especially around new procedures for arrival at work. • Face to face Inductions for staff on return to work. • Hand sanitiser throughout the offices and communal areas at all key points, including every meeting room • Viral transmission is very low in open air environments: Fresh air circulation encouraged - open windows where possible, meetings encouraged in car park and walking meetings (for staff and volunteers that are able) where social distancing is possible • AC air recycling function removed. This is to prevent any return air from the building mixing with the supply air. It is safe to use the air-con system. A recuperation damper used to heat supply air via heat taken out from return, this is an energy saving device. • 2nd floor Stationery store closed. Stationery delivered on request to stationery drop-off points on each floor • Signage throughout the office: hand cleaning protocols, social distancing and floor markings, cough sneeze and face touching advice. • Comms to staff advising if a confirmed case, and action taken. 	
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Working in the office	<p>Staff well-being - - Impact on wellbeing</p> <p>- mental health</p> <p>Staff/volunteers who are anxious and concerned about HRAC re-opening, including staff with diagnosed and undiagnosed mental health conditions.</p>	Employees Volunteers	<ul style="list-style-type: none"> • 1-to-1 conversations to take place with Managers to understand any concerns and anxieties and help provide support and reassurance. • Where a risk exists, or a concern, the 1 to 1 will explore options for additional measures that could address. • For any staff that are working in the office, managers should have regular check-ins that will understand wellbeing issues of staff and volunteers affected. This will be after the first shift worked in the office and weekly going forward. • If after the offices have re-opened, there are concerns with staff not adhering to social distancing etc., impacting on staff & volunteer safety & wellbeing, the risk assessment for the offices will be re-assessed. <p>Robust systems of health and safety are being put in place, which will help to reduce anxieties. E.g., Regular 1 to 1 conversation with line managers, increased cleaning regimes, frequent communications to staff.</p>	
Working in the office	Transmission from surfaces - Covid 19 can potentially remain on surfaces for up to 72 hours	Employees Contractors Visitors	<ul style="list-style-type: none"> • Sneeze guards at Reception desk • 'Staying COVID-19 Secure' poster displayed at entrance when compliant (after controls put in place) • Staff advised to wash their hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and after removing it. • Cleaning schedule increased to include frequent sanitisation using disinfectant of all touch points throughout the day (handrails, door handles, taps, lift buttons, kitchen areas including equipment, breakout tables, photocopiers) • Overnight cleaning of all used workstations • Desk markers given to staff on arrival at Reception will remind staff to sanitise their workstations at the beginning & 	

			<p>end of their shifts with sanitiser spray, disposable gloves and blue roll cleaning supplies AIUK will provide.</p> <ul style="list-style-type: none"> • Staff must clean printers using dry wipes before & after each use and sanitise hands after use. • Staff required washing their hands upon entering & leaving kitchen and disinfecting areas they have used. • Communal cutlery and crockery removed – staff members to supply their own • As many inner building doors as possible kept open to reduce the amount of contact points. • Sanitiser spray and blue roll provided. Staff expected to clean; workstations, kitchen & tea-point surfaces, printers before & after use • Paper towels provided as an alternative to hand dryers in handwashing facilities. Hand-dryers taped-off, out of use. • General stationery from meeting rooms removed • No personal deliveries to HRAC (from 1st Sep) • Deliveries quarantined for 24 hours; disinfectant spray & cloths provided 	
Working in the office	A. Moving around building	Employees Contractors Visitors	<ul style="list-style-type: none"> • Amnesty will have one designated entrance (Front door leading to Reception) and one designated exit (Back staircase leading to car park) only. Staff can only enter or exit the HRAC using these designated entrance/exit points. • The HRAC will have a designated 'Up' staircase and a designated 'Down' staircase. • The organisation will use markings and introduce one-way flow at entry, exit points and around HRAC. • Floor markers will be used to help people maintain 2 metres social distance • Reducing maximum occupancy for lifts. (One person only in lift at a time – Staff who have a disability or mobility issue have priority on lift use) Able-bodied staff are encouraged to use the stairs. • Providing hand sanitiser for the operation of lifts. • Defined queuing spacing for toilets & shower room 	

	B. Workstations	Employees Volunteers	<ul style="list-style-type: none"> • AIUK will not remove desks from service. Managers to split teams into working groups E.g. Mon & Wed only, Tues & Thurs only and fix these groups so that, where contact is unavoidable, this happens between the same people. • Clear desk policy throughout. Staff to store items in pedestals. All non-IT items on desks have been put in a box, pedestals have not been touched. On their first day back, staff are expected to sort out the contents of their boxes. These should be stored in their pedestal and any items that cannot fit in the pedestal need to be stored elsewhere or removed. Non-IT items should not be left on their desk at the end of the day • No 'face to face' or 'side to side' working allowed • Occupancy levels managed to enable social distancing • Desk markers given to staff on arrival at Reception will remind staff to sanitise their workstations at the beginning & end of their shifts with sanitiser spray, disposable gloves and blue roll cleaning supplies AIUK will provide. • Printers should be dry wiped before & after each use 	.
	C. Meetings	Employees Volunteers	<ul style="list-style-type: none"> • Note: From Sep through to April 2021, no physical use of meetings rooms until further notice. Meetings to take place using MS Teams • Meeting rooms will operate social distancing rules, sanitiser & cleaning materials placed in each room • Meeting room seating reconfigured to ensure 2m distance, spare chairs removed • Meeting rooms operating at 25% capacity or less. • Suggested 30-minute meeting limit • Using remote working tools to avoid in-person meetings • Allowing only absolutely necessary participants to attend meetings and maintaining two-metre separation throughout • Avoiding transmission during meetings, for example by avoiding sharing pens and other objects • Providing hand sanitiser in meeting rooms • Holding meetings outdoors or in well-ventilated rooms whenever possible 	

			<ul style="list-style-type: none"> For areas where regular meetings take place, using floor signage to help people maintain social distancing. <p>Confidential meetings at HRAC</p> <ul style="list-style-type: none"> The 1st floor Radio Room is the designated room for staff to have a confidential Teams call they can't make in open office space. Only one person is allowed in the Radio room. All other meetings must be held on MS Teams, using headsets so as not to disturb colleagues. To book the room (or to cancel a booking you have made), email Security & Robert Shuster. Covid cleaning protocol for the Radio Room: You must sanitise the workstation and any touchpoints in the room (E.g. door handle, light switch, desktop, phone) at the beginning and end of the meeting session, using the blue roll and disinfectant spray provided. You must get a desk marker from Reception and leave it in the radio room at end of meeting. Leave the blue roll and disinfectant spray in the room. 	
	<p>D. Common areas</p> <p>Break-out area, Kitchen, Shower Room, Reception, Tea points, Communal Toilets</p>	<p>Employees Volunteers</p>	<ul style="list-style-type: none"> Breakout area: Using safe outside areas for breaks Staggering break times to avoid pressure on break-out area Breakout area seating reconfigured to ensure 2m distance, spare chairs removed Cleaning schedule increased to allow for afternoon cleans Kitchen use: Only 2 staff at a time in 1st floor kitchen Signs up in kitchen to remind staff must wash hands immediately when first entering, then again when leaving Communal cutlery and crockery removed. Staff to bring their own food, cutlery, crockery, wash it up themselves and remove. Disinfectant spray provided in kitchen & Tea points. Staff to spray disinfectant on areas they have used. Requirement for staff to label their food in the fridge. Reception: No visitors allowed to the HRAC until further notice. 	

			<ul style="list-style-type: none"> • Defined waiting areas for visitors at Reception to allow for 2m distancing also defined safe queuing spacing for toilets, shower Rm and tea points • Shower Room use: Social distancing reminders on floor & walls • All personal belongings kept in lockers, no personal items to left out. Personal items left out will be removed at end of the day by Facilities • 2 people only in shower room at any one time • Door to shower room to be kept open when not in use to increase ventilation to the area • Shower use record chart to be filled out with staff name and date of use • Regular cleans by afternoon cleaner • Blue roll & disinfectant spray kept in shower room for staff to clean lockers and surfaces • Tea points: 1 staff member at a time to use tea point • Requirement for staff to label their food in the fridge in tea points. • Staff to regularly spray disinfectant on areas they have used. • Toilets: Some toilet cubicles taken out of action to limit scope for inadvertently being within 2m of other toilet users • No more than 2 people in communal toilets at any one time and safe queuing points marked out • Pigeonholes: Regular cleaning of pigeonholes, only 2 people to use at the same time, floor decals to show safe social distancing. 	
First Aid & Emergency	Note: With reduced number of people within the office, first aid & fire protocols may	Employees Contractors Visitors	<ul style="list-style-type: none"> • First Aid: First aiders are under no obligation to provide first aid care in any circumstances • Minor ailments to be managed by the individual where possible, under guidance of a first aider retaining 2m distance 	

	<p>be difficult to manage</p> <p>First aiders may be in danger of greater risk due of contracting COVID-19 due to close proximity needed to administer medical care</p>		<ul style="list-style-type: none"> • First aiders advised to only consider close 1 to 1 care if essential – preservation of life and immediate danger – and should never put themselves in danger when providing care • If essential first aid care is required, PPE E.g., disposable gloves, face masks, can be provided to reduce any risk of contracting COVID-19 • A supply of facemasks and disposable gloves kept on-site. • Anyone displaying symptoms of COVID-19 do not require the assistance of a first aider and should be sent home as per government guidance. • All first aiders required to take the 'First aid under Covid-19' refresher training courses supplied by St John's Ambulance & to confirm to Facilities when they have completed it. • Emergency: Updated procedure that in the event of an emergency E.g. fire or accident, social distancing is secondary to preserving life and safe evacuation, people do not have to stay two metres apart if it would be unsafe. • Fire marshals to monitor building users in order to assist vulnerable people in safe evacuation • CIS Security guards are trained 1st Aiders and will act as the nominated person to take responsibility & control for an emergency situation when no other 1st aiders or fire marshals are present 	
	<p>Contact with persons suffering from coronavirus – visitors and contractors</p>	<p>Employees Contractors Visitors</p>	<ul style="list-style-type: none"> • AIUK will accept no external visitors to the HRAC until further notice • Risk assessments and method statements are shared and analysed before the contractor comes to site • Face coverings are mandatory for contractors coming in for one-off visits to the HRAC for the duration of their visit. • Contractors are routinely monitored during their work to ensure compliance • Mandatory for anyone who accesses the building to make use of the hand sanitiser provided on the front desk 	

			<ul style="list-style-type: none"> • When Visitors are again allowed: Encourage visits via remote connection/working where this is an option. • Where site visits are required, explaining site guidance on social distancing and hygiene to visitors on or before arrival. • Revising visitor arrangements to ensure social distancing and hygiene, E.g. where someone physically signs in with the same pen in reception. • Providing clear guidance on social distancing and hygiene to people on arrival (for example, signage or visual aids) and before arrival (for example, by phone, on the website or by email). • Providing hand sanitiser in multiple locations in addition to washrooms. 	
	Coronavirus – contact with objects that come into the workplace and vehicles at the worksite	Operatives, other contractors and visitors	<ul style="list-style-type: none"> • Deliveries quarantined for 24 hours • Disinfectant spray & cloths provided for goods and merchandise entering the site. • Restrictions on non-business deliveries, for example personal deliveries to workers. • Increased handwashing frequency encouraged for workers handling goods and merchandise and provide hand sanitiser where this is not practical. 	
Monitoring & Review	It is important to establish effectiveness of procedures	Employees	<ul style="list-style-type: none"> • All staff are responsible for role modelling, following the procedures and encouraging others to do the same. Please feel free to politely mention to your colleagues if they are not following protocols. Staff encouraged to give feedback and report non-compliances to the Facilities Team. All feedback will be confidential. • Facilities to meet regularly to address and review policies and procedures • For Staff who want to raise a concern they should talk to their Line Manager/Head of Team in the first instance and 	

			then send an e-mail to the Facilities Manager cc-ing in the HR Team	
Vulnerable staff exposed to virus in HRAC	<p>AIUK recognises the higher risk of infection and impact to vulnerable groups of Covid 19 and will monitor government guidance for instruction.</p> <p>The latest PHE report states that some groups of people may be at more risk of being infected and/or an adverse outcome if infected.</p>	<p>The higher-risk groups include those who:</p> <ul style="list-style-type: none"> - are older males - have a high body mass index (BMI) - have health conditions such as diabetes - are from (BAME) backgrounds 	<ul style="list-style-type: none"> • No one is required to be in the office until Jan 2020 at the earliest • AIUK line managers to have discussions with vulnerable colleagues to ascertain any additional support needs <p>AIUK will consider using additional security precautions e.g.</p> <ul style="list-style-type: none"> • not having vulnerable staff/volunteers in public facing roles • providing/requiring face masks • Conducting specific vulnerable person's risk assessments • Discussing safest possible roles for clinically vulnerable workers who are returning to the workplace and considering possible redeployment opportunities 	
Cleaning	Disposal of waste that may be contaminated by a coronavirus sufferer/member of the	Cleaners Staff Volunteers Contractors	<p>Non-contaminated waste will be disposed of as per agreed practice with our cleaning company Julius Rutherford</p> <ul style="list-style-type: none"> • Cleaners to wear PPE, E.g. face masks & gloves • Regular cleaning of shower room facilities and other common areas E.g. toilets • Cleaners to Practise social distancing, keeping at least 2 metres away from other people 	

Cleaning	<p>public, i.e. public waste bins, personal protective equipment (PPE), etc.</p> <p>Transmission from surfaces - Covid 19 can potentially remain on surfaces for up to 72 hours</p>		<ul style="list-style-type: none"> • Mandatory for anyone who accesses the building to make use of the hand sanitiser provided on the front desk • Regular handwashing • All waste that has been in contact with the relevant person, including used tissues, and masks if used, should be put in a plastic rubbish bag and tied when full. The plastic bag should then be placed in a second bin bag, tied, and disposed of as hazardous waste in line with normal infection prevention control policies and procedures. • Overnight cleaning of all workstations • AIUK will operate a clear-desk policy throughout all its offices • Day Cleaner will concentrate on cleaning/disinfecting 1st floor kitchen; tea-points, LGF Shower Rm, toilet disinfecting and high touchpoints around the HRAC, 3-5 times a day. • Cleaning charts in toilets & shower room to show frequency of cleans • Each Friday designated 'deep clean' day. Staff work from home to allow cleaners to do cleans of specialist items like keyboards/mice/phones. • Ellis Whittam's COVID-19 Daily Cleaning Checklist completed after every visit 	
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Working in the office	<p>Coronavirus – Contracting and spreading of infection Handling Mail/ Processing/ Scanning cheques/ Accepting courier deliveries</p> <p>Security Guard Patrols</p>	<p>Employees Security Guards</p> <p>Security Guards</p>	<ul style="list-style-type: none"> • Staff & Security guards recommended to wear disposable protective gloves when handling mail/accepting courier deliveries • Deliveries placed in quarantine area by front door for 24 hours before handling. • Regularly wash hands/ Use hand-sanitiser • Practise social distancing if working with more than 1 member of staff, keeping at least 2 metres away from other people • Security officers going on patrol to wear disposable protective gloves as you will be opening doors/closing doors toilets etc. 	
	Fire alarm panel develops a fault	Employees Contractors Security Guards Cleaners	<ul style="list-style-type: none"> • CIS Security guards to conduct weekly fire alarm tests & report any faults to maintainer (Trinity) 	
	L8 Legionella build-up in disused water sources whilst office is empty	Employees Contractors Security Guards Cleaners	<ul style="list-style-type: none"> • CIS Security guards to conduct weekly flushing regime /Engie flushing (monthly). Opening up all taps & flushing all toilets • Regular testing for Legionella conducted by maintainer (Clearwater) 	

Review Record

Date of Review	Confirmed by	Comments
18/08/20	Robert Shuster	
18/08/20	Irene Fufeyin	
20/08/20	William Golder	
21/08/20	Louise Harris	
25/08/20	Kate Allen	

Appendix 1 – Sign-off and Review policy for AIUK Risk Assessments (RA)

1. For a risk assessment (RA) to be approved at AIUK, it must first go for review to the following groups: Facilities Team, HR, Safeguarding/Well-being, Amnesty team leader in particular RA's content (e.g. Bookshop Team Leader for Shops RA), Ellis Whittam (Amnesty nominated competent representative) and the Union.
2. Once all groups have input into RA's content and given their approval the Facilities Manager or Amnesty team leader will present RA to the Director of Corporate Services (DCS) confirming the RA has been through this process and is ready for sign-off.
3. DCS will review, and once happy with risk assessment, will recommend to CEO for approval. The RAs will also be shared with the rest of SMT for their information.
4. On approval from CEO, the DCS will sign off the risk assessment
5. The RA will be reviewed **periodically (bi-weekly)** by the Facilities Manager or the team leader in particular RA's content (e.g. Shop Team Leader for Shops RA)
6. If the any new risks merge, any existing risks increase or any new guidance is issued, then the risk assessment will be sent back to DCS to review and sign off.
7. The Facilities Manager will publish a statement on the AIUK web-site that each AIUK workplace is Covid 19 secure alongside the Government approved "Staying Covid-19 Secure in 2020" poster, with a link to the full RA for each site if staff wish to access it.

Appendix 2 – Audit of AIUK Risk Assessments (RA) before re-opening of sites, The HRAC, Nations & Regions Offices, Book Shops

1. Before re-opening all AIUK sites, an audit of the approved RA will take place to ensure all measures that need to be implemented to make that site safe have been completed.
2. Sites will not re-open until audit of RA complete.