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## COVID-19 RISK ASSESSMENT POLICY AND CODE OF CONDUCT

Triton has conducted an in-depth risk assessment (review) to produce policies that will mitigate the threat of COVID-19 in the workplace and fully protect everyone working for and with our business throughout the wider bathroom industry.

This 'COVID-19 Code of Conduct' plan, developed in accordance with best practice guidelines provided by HM Government, underpins our approach. These guidelines will be used, as required, to inform our statement on COVID-19 risk assessment and measures taken to ensure the avoidance and prevention of the spread of the Coronavirus.

This Code of Conduct applies to all Triton Showers operations and employees, with whom we work with directly or who are appointed to act on our behalf. Equivalent standards of behaviour and risk mitigation are also expected and apply to all persons acting on Triton's behalf, including suppliers and partners.

Triton has published and adheres to the attached 5 step plan Staying Covid-19 Secure, attached.

**David Tutton**  
**Managing Director**  
**February 2021**



## **PURPOSE OF THIS POLICY**

This statement outlines Triton's immediate actions to understand all aspects of the potential threat of COVID-19 (coronavirus) to business operations.

Following a thorough assessment of the risks posed by the virus outbreak and global pandemic, the following measures have been implemented to significantly reduce the risk of illness to those working both within its own business and throughout the wider supply chain.

This policy is particularly focused on the introduction of controls to reduce the spread of COVID-19 throughout Triton's HQ and factory, to protect all employees and visitors on site and as they carry out their employment duties.

The statement covers the activities of Triton Showers, based in Nuneaton, Warwickshire. Triton Showers is a division of Norcros Group (Holdings) Limited.

## **RESPONSIBILITY FOR THIS POLICY**

Ultimate accountability for the safeguarding of employees from the threat of COVID-19 while working on site at Triton's HQ and factory rests with Triton's leadership team. The Board of Directors of Triton has overall responsibility for ensuring this policy and its implementation comply with both legal and ethical obligations.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

Triton's Managing Director and HR Manager jointly ensure that all policies of this nature are consistently reviewed, compliant and relevant to the business and employees.

Furthermore, the HR Manager is also in charge of ensuring that policies are communicated correctly to the wider business, including the delivery of training to the appropriate departments and senior management team.

## **PREVENTING THE SPREAD OF COVID-19**

For the purpose of this policy, Triton has applied the tried and tested 'hierarchy of risk control' method when reviewing the challenges presented by COVID-19.

This has formed the basis of plans, deciding which controls can be devised and implemented to reduce the risk of exposure of employees and protect anyone else who could unintentionally be infected by a member of staff.

Additionally, Triton's risk assessment is based on the recognition of the virus as a hazard. It considers available knowledge that the virus is spread through minute water droplets which are expelled from the body by coughing, sneezing, talking, and breathing.

The policy also recognises that COVID-19 can be transferred to hands and onto surfaces, where it can survive for a period of time, depending upon the surface type, temperature and moisture content. As a result, the virus can be unknowingly passed from person to person.

While many survive the infection and may display low level to no symptoms at all, a significant risk is posed to the elderly, vulnerable and those with pre-existing or underlying health conditions. For this reason, Triton recognises COVID-19 as presenting a high hazard to health and safety.

## **CONTROL MEASURES TO SAFEGUARD AGAINST THE SPREAD OF COVID-19**

Triton has taken the following steps to help safeguard against the spread of COVID-19 in the workplace:

**Social distancing:** Measures are implemented to ensure that social distancing is strictly observed at all times. New procedures include the introduction of staggered starts to the working day, break, lunch and finish times.

Further changes, such as the removal of seating, introduction of plastic sheet partitioning on assembly lines, one-way systems and the relocation of workbenches and desks to allow correct distancing, have been made to communal areas. Triton has introduced signage, and warning tapes at entrances and designated walkways to serve as reminders to keep a safe distance. In addition, each work station is screened from the next both within production and all offices and meeting rooms have been withdrawn or identified with limits to numbers imposed.

Daily temperature checks for employees and any site visitor are mandatory, as is daily health screening questioning, while employees also must wear face coverings as they move around the building away from their designated workstation. Employees will be provided and can only wear company PPE. Detailed social distancing, site protocols and PPE guidelines are provided and discussed with all employees before they return to work.

**Hygiene:** Employees are always reminded of the importance of regular handwashing, especially on entering and leaving the site, as well as before and after breaktimes.

Soap, hot water, paper towels and sealed disposal bins are provided, with additional handwashing facilities and hand sanitiser dispensers installed throughout the offices, production, and warehouse areas. Posters highlighting strict hygiene guidelines are displayed throughout all areas of the building.

Production line and warehouse teams are advised to only use their own equipment, with appropriate antibacterial solutions supplied for regular cleaning of steering wheels and handles. Areas that are touched often, such as photocopiers, will be cleaned regularly too and sanitising wipes and cleaning materials are provided. Employees will also be supplied with antibacterial products to sanitise their own desks and workstations during the day.

**Remote working:** Employees identified as being able to work from home will continue to do so. Home working risk assessments will be carried out in these instances, with all meetings being held via Microsoft Teams or Skype, where possible.

**Vulnerable people:** Employees who have received a shielding letter from the government who cannot work from home, should not attend work.

**Service and sales visits:** The protection of employees working off site is of utmost importance. Regular deliveries of PPE kit will be made to service engineers and sales teams in order to fully protect them when making customer visits.

It is important to note that employees will not be allowed to work if they have been advised to self-isolate, if they display COVID-19 related symptoms or have been diagnosed as being infected with COVID-19.

Detailed guidance for external visits has been provided and must be adhered to at all times. During field visits, service engineers are required to wash their hands before entering a customer's home, using an alcohol-based sanitiser. Checks should also be made in advance to check that the domestic property or customer's commercial premises are COVID-19 free. The correct PPE kit must be worn at all times, as provided. Strict social distancing rules must be adhered to, with all offers of food or drink refused.

Following visits, service engineers and sales representatives are advised to wash their hands thoroughly, again using an alcohol-based sanitiser. Vehicles and cars must also be cleaned daily using appropriate products and work clothes washed separately to other apparel at 60°C as soon as possible.

**Contractors and deliveries:** Contractors are only allowed on site for essential maintenance. All contractors will have to adhere to Triton Site Operating procedures. Paperwork related to deliveries must be emailed in advance and drivers are to remain in their cabs where possible. Designated toilet facilities have been arranged and all contractors/drivers have been notified in advance of Triton's social distancing guidelines.

**Positive COVID-19 identification:** Should an employee be identified as having coronavirus symptoms, they will be told to leave site immediately or where circumstances prohibit this, asked to move to a designated Isolation Room. Furthermore, in the instance of a positive case, Triton's HR department would contact PHE and follow the advice given.

**Clear communication:** Information posters displayed on walls will remind employees and visitors of good personal hygiene practices at all times, including regular hand washing and social distancing.

## **POLICY REVIEW**

The outlined policy will be reviewed on a weekly basis by Triton's Board of Directors, in accordance with latest Government guidelines and advice.