

ENHANCED CLEANING & DISINFECTION POLICIES & PROCEDURES

1. POLICY

XYZ Law Office is implementing the following routine enhanced cleaning and disinfection policy as part of its COVID-19 Prevention Plan with the goal of ensuring a healthy and safe workplace for all and to ensure compliance Occupational Safety and Health Act (OSHA) and other applicable laws, public health guidelines, accreditation criteria and other standards.

2. SCOPE

This Policy applies to all XYZ Law Office facilities and workplaces, including XYZ-owned vehicles, as well as to all XYZ employees, volunteers, contractors, customers, clients and visitors. Failure to comply with it will be grounds for denial or entrance or immediate removal from the premises.

3. WORKPLACE ASSESSMENT

A competent person and member of the workplace joint health and safety committee (JHSC) or health and safety representative (HSR), as the case may be, will perform an assessment of XYZ Law Office facilities and workplaces, including XYZ-owned vehicles, to:

- Identify all surfaces and objects that require normal routine cleaning with soap and water;
- Identify which surfaces and objects also require disinfection;
- Determine how often cleaning and disinfection must be performed on the particular surface and object;
- Determine which materials must be used for cleaning and disinfection;
- Determine which health and safety measures must be followed for each particular cleaning and disinfection operation; and
- Determine which personal protective equipment (PPE) and health and safety equipment is required for each particular cleaning and disinfection operation.

4. CLEANING AND DISINFECTION PLAN DEVELOPMENT

On the basis of the above assessment, [*the XYZ Law Office EHS Director/each department area/other*] will create a cleaning and disinfecting plan using the following template:

Space	Scope	Responsible Party	Instructions/Frequency
Restrooms	All surfaces, objects and sinks, faucets, toilets, door handles, hand dryers and other fixtures	Custodial Department	Full daily cleaning and disinfection 5 times per week at night or early morning with high touch points cleaned a second time.

5. CLEANING AND DISINFECTION PRINCIPLES

In developing the above schedule, [*the XYZ Law Office EHS Director/each department area/other*] will ensure more frequent cleaning and regular disinfection of surfaces and objects that are frequently touched, including but not limited to doors in entrance/exiting areas, counters and shelves, desk surfaces, chairs and arm rests, tables, phones, computer keyboards (especially if shared), counters, light switches, lavatory surfaces, kitchen surfaces and appliances, doorknobs, elevators buttons, handrails, floors and other horizontal surfaces, shared tools and equipment, machinery and truck cabin (clean and disinfect the steering wheel, door handles, and frequently used levers and buttons. Outdoor areas generally require normal routine cleaning and do not require disinfection. In assigning responsibility for cleaning and disinfection, [*the XYZ Law Office EHS Director/each department area/other*] will, wherever practicable, rely on employees to clean their own areas and adjacent spaces so as not to overwhelm cleaning staff.

6. CLEANING AND DISINFECTION PROCEDURES

The [*the XYZ Law Office EHS Director/each department area/other*] who creates the above schedule will ensure that a specific procedure is created and implemented for carrying out the listed cleaning and disinfection procedure. Before disinfection, surfaces and objects should first be cleaned using a detergent, or soap and water. Disinfectants must be prepared in well-ventilated areas and handled safely by persons using appropriate PPE.

7. CLEANING AND DISINFECTION PRODUCTS

Disinfection must be performed using a disinfectant approved for use against the coronavirus (SARS-CoV-2). Disinfection must be performed using a disinfectant approved for use against coronavirus infection. When such products are not available, alternative disinfectants may be used, such as a mixture of 1/3 cup of 5.25%–8.25% bleach added to one gallon of water, or 70% alcohol solutions). Bleach solutions will be effective for disinfection up to 24 hours. Bleach may not be mixed together with other cleaning and disinfection products due to the risk of hazardous vapors. All cleaning and disinfection products must be used in accordance with manufacturers' instructions, including with regard to:

- Dilution and concentration;
- Application method and contact time;
- Required ventilation; and
- Use of PPE.

Disinfectants must be stored safely and away from food in closed containers that have proper OSHA Hazardous Communication (Hazcom) labels. Where disinfectants are dispensed into a secondary container, e.g., spray bottles, the secondary container must also have a proper Hazcom label identifying its contents.

8. CLEANING OF SOFT, POROUS SURFACES

Cleaning procedures for soft (porous) surfaces such as carpeted floor, rugs, and fabric chairs, must provide for removing visible contamination (if present) and cleaning with appropriate cleaners indicated for use on these surfaces. After cleaning, such items should be laundered using the warmest appropriate water setting in accordance with the manufacturer's instructions and then completely dried. iii. If laundering is not possible, a disinfectant approved for use against SARS-CoV-2 must be used.

9. PPE

Cleaning and disinfection procedures must specify the PPE required to ensure the procedure is carried out safely, which may include:

- Disposable gloves—once the procedure is over, users must immediately discard their gloves and wash their hands;
- Eye protection where there is a potential for splash or splatter to the face; and
- Gowns or aprons for larger scale or frequent cleaning (large surface area).