

# Loss prevention standards

# Measures to Reinstate Buildings, Premises and the Work Environment

Guidance on how to reduce risk when reinstating mothballed or shut down buildings and premises.



#### Introduction

This Loss Prevention Standard contains guidance on how to reduce risks when you are planning to reinstate or reopen buildings and premises that have been shut down or mothballed on a temporary basis, for example in response to a business downturn or forced closure due to external factors such as an epidemic/pandemic event.

It is not possible to provide detailed steps for every type of premises, but instead the following guidance seeks to support general principles that can be applied to the majority of situations and installations.

Such circumstances should be managed using your management of change procedures with a documented reinstatement plan derived and demonstrably followed. A checklist is provided as an appendix to this Loss Prevention Standard to aid you in the management of any reinstatement you are planning to make.

This document is part of a series of Aviva Loss Prevention Standards aimed at the reinstatement of premises, plant and operations and should be read in conjunction with the other standards in the series which include:

Measures to Reinstate Plant, Equipment and Processes

Measures to Manage People and Operations following Reinstatement after a Shutdown

#### **Planning**

It's critical to plan in detail the steps needed to reinstate buildings and premises. Allowing enough time and resources to enable thorough planning is vitally important and by doing so, the risks to your business can be greatly reduced. What needs to be considered depends on the building/premises. However, within your plans you may need to include the following issues/factors:

## Scope of Reinstatement Works and the Reinstatement

It can be helpful to prepare a scope of reinstatement works. This can consider:

- What you are planning to re-instate?
  - A single building within a site that is already operating?
  - An entire site or installation?
- The nature of the re-instatement?
  - Continuously and fully occupied?
  - Intermittently or partially occupied?
- Whether any changes are needed from how the building/premises were operated previously?
  - Changes to layouts or any necessary building alterations?
  - Changed or new machinery and equipment?
  - Any new facilities to accommodate changes in working practices such as social distancing, e.g. additional staff changing/welfare facilities, hand washing stations, toilets and lockers, floor markings, screens and barriers?
  - Changes to how the premises need to be maintained and cleaned?

You should consider developing a detailed re-instatement plan to oversee these works that is continually updated recording the progress of the reinstatement works.

#### **Scheduling**

When scheduling it can be helpful to build time to deal with unexpected delays and unforeseen circumstances. Where a phased reinstatement of premises or buildings is being considered, it important to also consider the impacts of the phased approach, particularly where "skeleton staffing" levels will be utilised in some areas or at particular times. Your plans should accommodate and seek to minimise risks from lone working, reduced supervision and absence of key personnel (e.g. first aiders) wherever possible.

#### **Notifying Stakeholders**

Consider who may need to know about the reinstatement and how and when they will be notified?

#### **Notifying Stakeholders**

- Employees needed to work within the building(s)?
- Insurers and Insurance Brokers?
  - Check that policy coverage remains in effect and revisit and understand any existing policy conditions or endorsements
- Regulatory Bodies?
  - Confirm that existing permits to operate remain in effect and that no changes or additional regulatory compliance requirements are needed
- Contractors?
  - Check that any contractors used for servicing, maintenance, catering, cleaning are still operating and able to provide the services you need
- Emergency Services?
  - If the premises have been shut down or mothballed for some time it maybe pertinent to discuss reinstatement with the Emergency Services
- Neighbours/shared premises?
  - Neighbours or other businesses sharing the premises may well have adjusted their own work practices and arrangements to reflect the shut down/mothballed status of your operations.
     Discussing reinstatement with them can help ensure that risks to each other's businesses and employees are adequately controlled following reinstatement.

#### **Additional Facilities**

Identifying any new or additional facilities that are needed is also important. This could include for example, additional toilets, changing rooms or welfare facilities. It's helpful to identify what's needed, where and when they can be sourced/installed and incorporate this into the plan.

#### **Emergency Procedures**

You should plan to review and if necessary, update emergency procedures to reflect the reinstatement and changes made. This may need to reflect the introduction of new hazards, altered configurations and layouts. If an increased risk to responding emergency services personnel results from the changes made, you may want to discuss this with the Emergency Services.

#### Security

You may also need to plan for the re-introduction of security arrangements that reflect the renewed activity at the premises. This could include the:

- Reintroduction of security guarding or a gatehouse operation for access control to the premises
- Re-programming and reinstatement of building/site access control systems
- Need for staff security searches, taking into account any restrictions relating to social distancing and restrictions on personal interaction. For example, in an ongoing pandemic situation, it may be inappropriate to resume random staff search operations
- Need for additional security measures/guarding to deter any acts of violence towards employees

#### **Impacts on Business Continuity Planning**

Updating the Company's Business Continuity Plan (BCP) is a further consideration, especially if the reinstatement of these premises is critical to ongoing business, affects any in-company interdependencies, or provides new make-up capacity.

#### **Testing the Plan**

For some businesses looking to reinstate operations across multiple locations you may want to test the reinstatement plans at a single or small selected number of premises first. If time permits, this is a prudent approach and can allow aspects of the reinstatement plan to be evaluated and if necessary revised and altered.

## Reinstatement of Buildings and Premises

Where entire buildings or premises have been shut down or mothballed, a number of specific steps can help ensure they are returned to a state that is suitable and safe for the intended occupancy and re-use. Considerations include:

#### **Premises Integrity and Structural Damage**

Thoroughly check the building(s) for any problems that have occurred whilst it's been shut down including:

- Roof leaks
- Escapes of water/fluids from pipes and systems
- Subsidence, heave and building movement
- Flooding and backing up of drains/sewers
- Infestations of insects, rodents and other vermin
- Malicious damage
- Damage by trees or ingress of foliage

- Fly tipping
- Theft of materials/equipment
- Damaged lighting systems

Make any repairs/replacements necessary. Cut back any foliage that is impinging on the building and take the opportunity to inspect and clear any gutters/down spouts and surface water drains.

#### Security

- Where appropriate inspect the condition of the perimeter fence and gates. Make any repairs and reinstate a secure perimeter where possible
- Check the condition of doors, shutters and windows, ensure locks operate and function correctly
- Confirm that any external security lighting is operationalReassess the needs for security access control, re-issuing access control cards/keys where required
- Inspect and service intruder alarms and CCTV systems. Check off site signalling arrangements and ensure there is an appropriate response to any activations and identified intrusion, e.g. keyholders or preferably a police response
- Consider whether any additional security measures are appropriate, e.g. security guarding

#### **Fire Safety**

- Review and update the fire risk assessment for the building
- Inspect, service and maintain fire alarm systems, confirming audibility throughout the premises and signalling to a constantly manned location or preferably an approved Alarm Monitoring Centre (AMC)
- Check the operation of emergency lights and consider the impact that the shutdown has had on battery backup units
- Inspect fire doors and fire exit routes, including final exit doors. Check the door's condition and whether it opens and closes correctly
- Check the condition of fire walls and the operation of any fire shutters (servicing them if required)
- Check the operation of smoke vents
- Ensure any specialist evacuation equipment such as Evac Chairs are provided where necessary and that they remain in good condition
- Service and maintain all fixed fire protection systems and sprinkler systems. Competent service engineers should validate that systems are fully operational and will perform adequately if required
- Check the provision and condition of all fire extinguishing appliances. Ensure all units provided are suitable for the risks in their locality and are in serviceable condition

 Check the flow from private fire hydrants and the operation of any hose reels, dry/wet risers and where appropriate the contents and condition of hose boxes and their contents

#### **Plant, Equipment and Manufacturing Processes**

 Careful consideration is required before you restart plant, equipment and manufacturing processes.
 Specific advice is provided within the <u>Aviva Loss</u> <u>Prevention Standard - Measures to Reinstate Plant</u>, <u>Equipment and Processes</u>.

#### **Utilities**

**Electrical Installation -** If the electrical installation is overdue it's formal fixed inspection and test required under the 2008 ETCI Wiring Regulations, these works should be scheduled within the reinstatement plan and completed by a competent electrical contractor. Further information and guidance is provided from the <u>Health and Safety Authority</u>

If an inspection and test is not yet due it can still be prudent to use thermal imaging tools to check for electrical hazards associated with electrical distribution boards and any electrical connections which may have become loosened during the shutdown. Testing of electrical circuit breakers, Residual Current Devices (RCDs) and surge protection devices is also advised. If Uninterruptible Power Supplies (UPS) are provided, these should be checked and tested to confirm correct switching and operation.

**Gas Supplies** – Exercise gas isolation valves and check the operation of any interlocks to fire alarm systems or other safety devices on specific equipment or installations.

**Water Supplies/Systems –** Implement legionella risk control measures including:

- Disinfection
- Flushing water outlets including showers
- Checking adequate temperatures at sentinel taps and at any calorifier
- Confirming absence of legionella using testing completed by a competent person where appropriate

Legionella is a key risk during the reinstatement of buildings and it is always best to ensure you are fully compliant with <u>HSA Guidance</u> on the management of legionella risk prior to resuming occupancy and ensuring that workers undertaking the reinstatement works are adequately protected.

If drinking water or process water is provided from a bore hole or is treated by a purification plant, tests confirming adequate water quality should be completed.

**Effluent Treatment and Pollution Control** –You should check the condition, operation and performance of any equipment provided for effluent treatment and pollution control, confirming that limits/restrictions on

pollution control, confirming that limits/restrictions on discharges to sewers, watercourses or release to air will not be breached when operations re-start.

#### **Floors and Surfaces**

Its highly advisable to inspect the condition of floors and surfaces and make repairs where practicable. It can be a good idea to thoroughly clean them also or take the opportunity to look at other ways to improve the coefficient of friction of the surface to reduce risks of slips and falls before occupancy starts. Repairs and replacement of any entrance matting can also reduce these risks during wet weather. Check external areas also, repair loose flagstones, fill potholes and ensure any bins providing stocks or grit/rock salt are appropriately stocked.

#### **Kitchens and Catering**

- Complete pre-start up cleaning of kitchen areas (equipment, surfaces and floors) including where appropriate, deep cleans]
- Check ventilation and extraction systems. Clean and replace filters and complete a thorough clean of kitchen extract systems from plenum to air.
   Further guidance is available from the RISCAuthority Recommendations for Fire Safety in commercial kitchens
- Check that servicing and maintenance of fixed fire protection systems remains in date and that all units are armed
- Test gas proving systems where possible and test gas e-stops also
- Test electrical safety trips RCDs
- Ensure the servicing of cooking appliances is not overdue
- Check any remaining inventory of foodstuffs and discard out of date produce/items
- Ensure any oil that has been left in frying units is changed and replaced with the correct levels of fresh clean cooking oils
- Check pest control arrangements have been maintained and remain active and effective
- Check floor drains for fat blockages, etc.
- Tidy and organise store rooms

#### **Welfare Facilities**

Inspect and clean toilets, changing rooms and other employee welfare facilities. Ensure there are enough, taking into account changes in employee numbers an any changes in work or social hygiene practices.

#### **Exposures and Neighbours**

Check that changes to work practices and/or storage arrangements of neighbouring businesses or those who share the premises haven't introduced new hazards that could impact the safe operation of your premises and processes. Where appropriate liaise with your neighbours explaining any difficulties and devising any mutually beneficial changes/alterations that can be made.

#### **Wastes and Storage**

Remove and clear any wastes, fly tipped materials and unwanted items. Ensure there is adequate provision of suitably positioned bins and skips to permit your proposed operations. Take opportunities to create wastes storage areas well away from buildings, areas used by smokers, and other areas where the wastes will be at increased risk of fire/arson. Make arrangements for regular waste collection to minimise significant accumulation of wastes.

Also refrain from storing idle pallets, plastic IBC's or other combustible goods within 10m of the building so far as is possible.

#### Reinstatement Following a Pandemic

Resuming operations during or following a pandemic brings a number of specific challenges for each organisation. Risks will be distinctly unique to the premises and processes operated. However, the following are some of the <u>additional</u> considerations which you may need to consider within your plans to reinstate buildings and premises following a pandemic.

Social Distancing and Infection Control – It's important that you check and follow Government guidelines on social distancing and infection control. Consider how they can be applied to your workplace. You may need to adjust the working environment, develop/devise new working practices and alter employee working patterns to comply with these guidelines and to create lower risks for employees whilst at work and on their journeys to and from work.

**Procedures for Reporting Ill Health** – Your employees should be provided with clear guidelines on the steps they should take if they feel ill whilst at work and at home. These should be unambiguous and in line with Government guidelines.

Restricting Visitors – Until the risk of spread of the pathogen subsides, limiting and restricting who is allowed to access the workplace is an important risk control measure, and persons within the workplace should only be those essential for its safe operation. With the exception of an enforcement officer, it is unlikely that a visitor will have a legitimate reason to be on site. You can make good use of video-conferencing tools where other stakeholders are wishing to view/review site operations.

**Contractors** – You may still need to utilise sub-contractors for key tasks, including cleaning and maintenance. It is important that you check and review the contractor's arrangements and protocols for reducing the risk of spread of the pathogen whilst on your premises. These details should be provided to you within the risk assessments and method statements before attending site.

Washing/Cleaning/Laundry – You may need to review your provision of facilities for hand washing and cleaning, ensuring there are a sufficient number of appropriately sited hand washing facilities that are kept well stocked with soaps, hand cleaners, sanitisers, hand drying equipment and where appropriate moisturisers. Knee operated or automated taps as well as automated soap dispensers can reduce risks of cross contamination. Reminders of correct hand washing techniques can also be helpful. Resources to help you promote good hand hygiene can be found in the Sources and Useful Links section later in this document.

Ensuring that work surfaces, including floors are regularly cleaned and sanitised is especially important. Where workstations are having to be shared (e.g. by employees on different shifts), it is important this is done between each use.

Careful consideration is required where workwear is required to be laundered. In such circumstances, it is recommended that where available you follow advice specific to your sector provided by Health Service Executive or advice is sought from your specialist laundry services provider.

Personal Protective Equipment (PPE) - During a pandemic, supplies of PPE may have been diverted to support national efforts for infection control. This may mean you are unable to source items of PPE that you normally provide for your workers. If you are unable to source suitable PPE and your risk assessment shows this is necessary for effective risk control, you should explore other options and engineering controls to reduce risk. Be wary of any temporary relaxation of PPE requirements without being able to adequately demonstrate that risks are reduced to an acceptable level by other means. If you are unable to do this, review whether it is appropriate to restart your operations.

Temporary Relaxation of Statutory Obligations - In some circumstances, national governments may relax statutory obligations for a short-defined period to help businesses reduce risks of spread of infection during a pandemic. However, you should not assume statutory obligations have been relaxed unless you have had this confirmed from an authoritative source. It's always best to check with the relevant enforcing authorities:

Information and advice from the Health and Safety Authority can be found <u>here</u>.

Information and advice from the Commercial Vehicle Roadworthiness Testing can be found <u>here</u>.

Where this is the case you should note on your risk assessments details of the relaxation and its expiry date. Scheduling the date of expiry within future work plans can help you ensure that your business remains fully compliant.

**Residual Homeworkers** – Some employees may be required to continue working from home. It's important that these employees are not overlooked within work plans and that risks to the continued health, safety and wellbeing are assessed and managed. Further guidance can be found with the Heath and Safety Authority <u>Homeworking</u>.

Mental Health and Wellbeing – Loss of loved ones, anxiety over catching an infection or risk of loss of employment and the additional pressures of working that maybe experienced during a pandemic can be very detrimental to an employee's mental health and wellbeing. It's especially important that employees feel supported during a crisis of this nature. Encourage employees to be honest about their feelings and where possible put in place mechanisms by which employees

can access support services. These do not need to be privately provided wellbeing and mental health services and can be publicly available services provided by various charities. Help and sources of support can be found at the HSE website.

#### Checklist

A generic Measures to Reinstate Buildings, Premises and the Work Environment Checklist is presented in Appendix 1 which can be tailored to your own organisation.

#### Sources and Useful Links

Government, HSA and HSE advice should be followed and they can be found at:

Ireland Gov Roadmap to ReOpening Society & Business

Ireland Gov. <u>Return to Work Safely Protocol</u>
Agency Support Irish business during the Covid19
pandemic <u>Here</u>

Covid-19 <u>Advice for Employers & Employee</u> Health & Safety Authority

HSE Covid-19 Update latest Information <u>Here</u>
Securing Building Sites <u>Garda Advice Here</u>
NSAI Covid-19 <u>Workplace protection & Improvement</u>
<u>Guide</u> <u>Here</u>

Resources for help promote good hygiene practices can be found at:

<u>How to wash your hands</u> – Health Service Executive <u>Face Masks and Gloves</u> – Health Service Executive

#### **Additional Information**

Aviva Ireland Covid-19 Initiatives <u>Here</u> Aviva Ireland Covid-19 Other Loss Prevention Standards here

### Appendix 1 - Measures to Reinstate Buildings, Premises and the Work Environment

Location			
Date			
Completed by (name and signature)	Name:	Signature:	

	Planning	Y/N	Comments
1.	Have you prepared a scope of works with a supporting schedule to support your reinstatement plans?		
2.	Have you notified the appropriate stake- holders of your plans to reinstate your process/plant/premises?		
3.	Have you prepared a staffing/resources plan to complete the reinstatement works?		
4.	Have you identified any additional facilities that maybe needed to permit reinstatement and resumption of operations?		
5.	Have you planned to review and update emergency procedures?		
6.	Have you planned to review security measures that will be necessary during and after reinstatement?		
7.	Have you planned to review and update your BCP to reflect the reinstatement and any changes made?		
8.	If reinstating multiple buildings/premises/ locations, is it possible to test the plan at a single/small number of locations before implementation?		

	Reinstatement of Buildings and Premises	Y/N	Comments		
Premis	Premises Condition				
	Have you inspected the building for any problems that have occurred whilst it's been shut down including:				
9.	<ul> <li>Roof leaks</li> <li>Escapes of water/fluids from pipes and systems</li> <li>Subsidence, heave and building movement</li> <li>Flooding and backing up of drains/ sewers</li> <li>Infestations of insects, rodents and other vermin</li> <li>Malicious damage</li> <li>Damage by trees or ingress of foliage</li> <li>Fly tipping</li> <li>Theft of materials/equipment</li> <li>Damaged lighting systems</li> </ul>				
Buildin	g Security	ı			
10.	Have you inspected the condition of any perimeter fencing/gates, making repairs where necessary?				
11.	Have you checked the condition of doors, shutters and windows, ensuring that locks operate and function correctly?				
12.	Have you confirmed that any external security lighting is operational?				
13.	Have you reinstated security access control systems, re-issuing access control cards/ keys and resetting lock combinations where required?				
14.	Have you inspected and serviced intruder alarms and CCTV systems?				
15.	Are any additional security measures required?				
Fire Prevention and Mitigation					
16.	Have you reviewed and updated the fire risk assessment for the building?				
17.	Have you inspected, serviced and maintained fire alarm systems, confirming audibility throughout the premises and signalling to a constantly manned location or preferably an approved ARC?				

	Reinstatement of Buildings and Premises	Y/N	Comments	
Fire Prevention and Mitigation				
18.	Have you checked the operation of emergency lights and considered the impact that the shutdown has had on battery backup units?			
19.	Have you inspected the condition and operation of fire doors and fire exit routes, including final exit doors?			
20.	Have you checked the condition of fire walls and the operation of any fire shutters (servicing them if required)?			
21.	Have you check the correct operation of smoke vents?			
22.	Have you ensured that any specialist evacuation equipment such as Evac Chairs are provided where necessary and that they remain in good condition?			
23.	Have you serviced and maintained all fixed fire protection systems and sprinkler systems?			
24.	Have you confirmed there is adequate provision of fire extinguishing appliances?			
25.	Have you checked the flow from private fire hydrants and the operation of any hose reels, dry/wet risers and where appropriate the contents and condition of hose boxes and their contents?			
Electric	cal Installation			
26.	Has the electrical installation been inspected and tested as required under the 2008 ETCI Wiring Regulations and have all faults been repaired?			
27.	Have you used thermal imaging tools to check for electrical hazards associated with electrical distribution boards and any electrical connections which may have become loosened during the shutdown?			
28.	Have you confirmed the correct operations of all electrical circuit breakers, RCDs and surge protection devices?			
29.	Have you checked and tested any UPS to confirm correct switching and operation?			

	Reinstatement of Buildings and Premises	Y/N	Comments		
Gas Su	Gas Supplies				
29.	Have you exercised gas isolation valves and checked the operation of any interlocks to fire alarm systems or other safety devices on specific equipment or installations?				
Water :	Supplies				
30.	<ul> <li>Have you implemented suitable legionella risk control measures, including:</li> <li>Disinfection and cleaning?</li> <li>Flushing water outlets including showers?</li> <li>Temperature checks at sentinel taps and calorifiers?</li> <li>Legionella testing?</li> </ul>				
31.	Have you taken steps to ensure that any cooling towers or evaporative condensers can be safely re-started with legionella risks adequately managed and in compliance with HSA guidance?				
32.	Have you confirmed the quality of any drinking water or process water provided from a bore hole or treated by a purification plant?				
Plant,	Equipment and Processes				
33.	Have you implemented plans for the safe reinstatement of plant, equipment and processes?				
	Refer to Aviva LPS – Measures to Reinstate Plant, Equipment & Processes.				
Effluent Treatment and Pollution Control					
34.	Have you checked the condition, operation and performance of any equipment provided for effluent treatment and pollution control, confirming that limits/restrictions on discharges to sewers, watercourses or release to air will not be breached when operations re-start?				

	Reinstatement of Buildings and Premises	Y/N	Comments	
Floors and Surfaces				
35.	Are floors, surfaces including external yards, car parks and pathways in acceptable condition?			
36.	Are grit bins and stocks of rock salt suitably positioned and have been replenished?			
Kitcher	ns and Catering			
37.	Have you completed all necessary pre-start up cleaning of kitchen areas (equipment, surfaces and floors) including where appropriate, deep cleans?			
38.	Have you checked the integrity of kitchen extraction systems, cleaned or replaced filters and completed a thorough clean of the systems from plenum to air?			
39.	Is the servicing and maintenance of fixed fire protection systems up to date and are all units armed?			
40.	Have you tested gas proving systems and gas e-stops where possible confirming correct operation?			
41.	Have you tested electrical safety trips/RCDs provided for electrical cooking appliances?			
42.	Have cooking appliances been serviced and maintained in accordance with manufacturer's recommendations?			
43.	Have all out of date foodstuffs been discarded from stores?			
44.	Have oils within oil frying units been replaced and filled to the correct safe levels?			
45.	Are suitable pest control measures in place?			
46.	Have you cleared grease traps and inspected floor drains for fat blockages?			
47.	Are storerooms tidy and well organised?			
Welfare facilities				
48.	Is there a sufficient number of toilets, changing rooms and other employee welfare facilities?			
49.	Are arrangements in place to ensure they remain in a clean and hygienic condition?			

	Reinstatement of Buildings and Premises	Y/N	Comments		
Exposu	Exposures and Neighbours				
50.	Have you checked that changes to work practices and/or storage arrangements of neighbouring businesses or those who share the premises haven't introduced new hazards that could impact the safe operation of your premises and processes?				
Wastes	and Storage	'			
51.	Have you removed and cleared any wastes, fly tipped materials and unwanted items?				
52.	Is there sufficient provision of bins and skips located in areas where they are not creating an increased fire/arson?				
53.	Are there arrangements in place for regular waste collection to prevent significant accumulations?				
54.	Have you arranged external storage areas such that idle pallets, plastic IBC's or other combustible goods are not stored within 10m of the building so far as is possible?				

	Reinstatement Following a Pandemic (additional considerations)	Y/N	Comments
55.	Have you been able to fully implement Government guidelines relating to social distancing, infection control and shielding/ protection of vulnerable persons?		
56.	Have you established and communicated to employees' procedures and protocols they must follow should they feel ill at work or at home?		
57.	Have you made arrangements for the cleaning and sanitisation of the workplace in accordance with Government guidelines?		
58.	Have you prohibited unnecessary visitors to the workplace and established alternative arrangements such as video conferencing for stakeholders wishing to speak with employees and to view the premises and processes?		
59.	Have you checked that contractors working at your site are able to fully comply with social distancing and other infection control procedures?		

	Reinstatement Following a Pandemic (additional considerations)	Y/N	Comments
60.	Is there adequate provision of suitably designed facilities for hand washing and cleaning, with a sufficient number of appropriately sited hand washing facilities that are kept well stocked with soaps, hand cleaners, sanitisers and where appropriate moisturisers?		
61.	Have you identified and put in place procedures to minimise risks of spread of contamination/infection from any contaminated workwear?		
62.	Are you able to maintain supplies of appropriately specified PPE?		
63.	Have you implemented a system to ensure you manage any temporary relaxation of statutory obligations so that you remain legally compliant?		
64.	Have you assessed risks to employees who remain as homeworkers, with adequate risk controls demonstrably implemented?		
65.	Have you ensured employees know how to access services that provide support for mental health and wellbeing?		
66.	Additional comments:		

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