

Coronavirus (Covid 19) Pandemic Risk Assessment

Date of Review: 30-01-23
 Assessment Carried out by: James Maidment
 Assessment Date: 30-01-23

Note: The Risk Assessment covers the key risks as identified in the government guidance and the checklist goes into more granular detail as we have seen fit

Hazard	Number of people at risk	Controls in place	Measures Taken	Implemented London	Further Controls Required	Implemented
<u>Hand Washing.</u>						
Spread of Covid 19	50+	Hand washing facilities with soap and water.				
Spread of Covid 19	50+	PPE stations in place on all floors, including hand sanitiser, disposable gloves, anti-bac wipes and anti-bac spray.	Hand washing/sanitising and drying facilities in washrooms regularly checked and refilled. Extra hand sanitising stations installed at all entry/exits. Signage in place to build awareness of good handwashing technique and frequency.	Y		
Spread of Covid 19	50+	Drying of hands with disposable paper towels and hand air driers.				
Spread of Covid 19	50+	Signage introduced.				
<u>Cleaning/Hygiene</u>						
Spread of Covid 19	50+	Frequent disinfecting of washrooms and showers.	Daily cleaning in place	Y		
Spread of Covid 19	50+	Frequent disinfecting of door handles, lift call buttons and light switches.	Extra Housekeeper to ensure all extra disinfecting duties are carried out	Y		
Spread of Covid 19	50+	Frequent disinfecting of kitchen/tea point surfaces and other areas of high use.	Extra Housekeeper to ensure all extra disinfecting duties are carried out	Y		
Spread of Covid 19	50+	Frequent disinfecting of meeting room tables and chairs.	Extra Housekeeper to ensure all extra disinfecting duties are carried out	Y		
Spread of Covid 19	50+	Frequent disinfecting of meeting room equipment ie keyboards and phones.	Extra Housekeeper to ensure all extra disinfecting duties are carried out	Y		
Spread of Covid 19	50+	Safe and compliant procedure for disposing of waste introduced.	Cleaning contractor aware of correct procedure for disposal of waste with cleaning staff trained according.	Y		
Spread of Covid 19	50+	Signage introduced.	Extra signage in the office to build awareness of personal hygiene standards. Extra Housekeeper to ensure all extra disinfecting duties are carried out.	Y		
Spread of Covid 19	50+	Restricting the use of high-touch items. ie copiers, printers etc	Hand sanitiser, gloves, anti-bac wipes and anti-bac spray located by high-touch equipment.	Y		
Spread of Covid 19	50+	Increase office ventilation.	All HVAC services have been increased and regularly maintained.	Y		
<u>Social Distancing Measures</u>						
Spread of Covid 19	50+	Employees to work remotely.	Bank ABC have introduced a permanent Hybrid working model based on 3 days in the office and 2 at home while infection rates remain low.	Y		
Spread of Covid 19	50+	Extra tea/breakout areas introduced on all floors.	Kitchens only	N	Re-introduce when required	
Spread of Covid 19	50+	Limit number of people using meeting rooms.		N	Re-introduce when required	
Spread of Covid 19	50+	Conference calls/Zoom meetings to be used instead of face to face meetings.		N	Re-introduce when required	
<u>PPE</u>						
Spread of Covid 19	50+	Provision of disposable facial masks	If employees come to the office part of the Banks duty of care is to supply appropriate PPE if requested. A 3 month supply of PPE should be kept on site.	Y		
Spread of Covid 19	50+	Provision of disposable gloves where needed and instruction given on how to remove gloves carefully and safely.	If employees come to the office part of the Banks duty of care is to supply appropriate PPE if requested. A 3 month supply of PPE should be kept on site.	Y		
<u>Mental Health.</u>						
Spread of Covid 19	50+	Mental Health First Aiders information and contact details readily available to all employees.	HR to contact all employees working remotely with details of Mental Health First Aiders and posters in kitchens. Line Managers to maintain regular contact with employees.	Y		
<u>Symptoms of Coronavirus (Covid 19).</u>						
Spread of Covid 19	50+	Temperature checks to be taken upon arrival to the office.		N	Re-introduce when required	
Spread of Covid 19	50+	Anyone with a high temperature to be sent home.		N	Re-introduce when required	
<u>Testing</u>						
Spread of Covid 19	50+	Tests to be procured and issued to staff who are attending the office	Tests have been issued and anybody testing positive is to stay away from the building until a negative PCR test has been received or recovery from the virus has been achieved.	Y		
<u>Single Point of Contact - SPOC</u>						
Other	50+	James Maidment - Head of Corporate Services, has been nominated as the single point of contact for ABCIB in the event of a COVID-19 outbreak.	In the event of an outbreak at the London office the Head of Corporate Services will notify Public Health UK and update the CMT accordingly.	Y		

FCA Requirement	Confirmation of Compliance	Additional Comments	Further Controls Required	Implemented
Firms should be able to prove that the lack of a centralised location or remote working does not or is unlikely to:				
Affect the firm's location in the UK, or its ability to meet and continue to meet the threshold conditions for the regulated activities it has or will have permission for – or any equivalent requirements, where these do not apply.	Y	No change in Head Office building location	N/A	N/A
Prevent the FCA receiving information about a firm.	Y	No restrictions to sending information requested by FCA. We have successfully maintained close contact with our regulators throughout the Pandemic.	N/A	N/A
Reduce the accuracy of the Financial Services (FS) Register for others if, for example, consumers are not able to contact the firm at the principal place of business shown on the FS Register	Y	No impact on customer contact	N/A	N/A
Affect the ability of the firm to oversee its functions including any outsourced functions.	Y	No impact on oversight of functions, including outsourced services	N/A	N/A
Cause detriment to consumers.	Y	Customer Complaints have been dealt with as BAU	N/A	N/A
Damage the integrity of the market.	Y	N/A	N/A	N/A
Increase the risk of financial crime.	Y	Financial Crime controls in place and functioning as usual	N/A	N/A
Reduce competition.	Y			
A firm must also prove that there is satisfactory planning:				
That there is a plan in place, which has been reviewed before making any temporary arrangements permanent and is reviewed periodically to identify new risks.	Y	All plans are reviewed by CMT prior to changes to operating model being implemented	N/A	N/A
There is appropriate governance and oversight by senior managers under the Senior Managers regime, and committees such as the Board, and by non-executive directors where applicable, and this governance is capable of being maintained	Y	All Committees were held as per applicable Governance throughout the Pandemic and continue to do so under our Hybrid working model.	N/A	N/A
A firm can cascade policies and procedures to reduce any potential for financial crime arising from its working arrangements.	Y	All PSP documentation is published on a centralised SharePoint library accessible to all staff and also circulated as required by applicable governance.	N/A	N/A
An appropriate culture can be put in place and maintained in a remote working environment.	Y	Promotion of a positive work culture continued throughout the Pandemic and under our current Hybrid working model.	N/A	N/A
Control functions such as risk, compliance and internal audit can carry out their functions unaffected, such as when listening to client calls or reviewing files.	Y	All control Functions confirmed that they continued to operate effectively during the pandemic and continue to do so under our current Hybrid working model. The ability to carry out analysis and deal with sensitive matters can be maintained successfully	N/A	N/A
The nature, scale and complexity of its activities, or legislation, does not require the presence of an office location.	Y	A limited number of critical core banking processes cannot be undertaken outside of the office environment due to the risk appetite of our parent however the majority of functions are not restricted by location.	N/A	N/A
It has the systems and controls, including the necessary IT functionality, to support the above factors being in place, and these systems are robust.	Y	We have a robust and secure VPN capability which allows over 90% of staff to work remotely.	N/A	N/A
It's considered any data, cyber and security risks, particularly as staff may transport confidential material and laptops more frequently in a hybrid arrangement.	Y	This has been assessed and staff are frequently reminded of their responsibilities relating to data, cyber and security risks.	N/A	N/A
It has appropriate record keeping procedures in place.	Y	All record keeping procedures are in place and adhered to.	N/A	N/A
It can meet and continue to meet any specific regulatory requirements, such as call recordings, order and trade surveillance, and consumers being able to access services.	Y	We maintain all monitoring activities appropriate to our business model.	N/A	N/A
The firm has considered the effect on staff, including wellbeing, training and diversity and inclusion matters.	Y	This was a major area of focus for both the CMT and HR teams throughout the Pandemic and continues under our current Hybrid working model.	N/A	N/A
Where any staff will be working from abroad the firm has considered the operational and legal risks.	N/A	No employees working abroad as BAU	N/A	N/A

Please note all below requirements are currently suspended however would be re-introduced in the event of increased infection rates and/or government lockdown

Checklist of Government Guidance for Working Safely During Covid -19 in offices and contact centres						
Action Required	Responsible	Implemented Y/N	Staff at Risk	Evidence if necessary	Comments	
General						
1 Complete Risk Assessment	IB/M/C	Y	50+	Approved by CMT		
2 Who should go to work	MC	Y	50+	Spreadsheet on Minimum/Maximum Staff by Department		
3 Plans for minimum number of staff needed on site to work safely	AS	Y	50+	Regular Line Manager and HR communication with staff		
4 Keeping in touch with off-site workers	AS	Y	50+	Regular Line Manager and HR communication with staff		
5 Provide equipment to enable staff to work from home safely	IM/B	Y	50+	Spreadsheet		
6 Provide support for workers around mental health and wellbeing	AS	Y	50+	Communication to staff		
7 Enabling workers to work from home when self-isolating if appropriate	AS	Y	50+	Database with HR, collated with input from Line Managers		
8 Understanding and taking into account the particular circumstances of those with different protected characteristics.	AS	Y	50+	Extremely vulnerable excluded from return to work		
9 Involving and communicating appropriately with workers whose protected characteristics might either expose them to a different degree of risk, or might make any steps you are thinking about inappropriate or challenging for them.	AS	Y	50+	Communication to staff		
10 Considering whether you need to put in place any particular measures or adjustments to take account of your duties under the equalities legislation.	AS	Y	50+	Communication to staff		
11 Making reasonable adjustments to avoid disabled workers being put at a disadvantage, and assessing the health and safety risks for new or expectant mothers.	AS	Y	50+	Communication to staff		
12 Making sure that the steps you take do not have an unjustifiable negative impact on some groups compared to others, for example, those with caring responsibilities or those with religious commitments.	AS	Y	50+	Communication to staff		
Social Distancing in the Workplace						
13 Implement two meter social distancing measures in the office (applies to all parts of the business)	IM/B	Y	50+	Tape and desk allocation - See floorplan		
Coming to Work and Leaving Work						
14 Stagger arrival and departure times	Line Managers	Y	50+	Communication to line managers to ensure staggering of staff being submitted simultaneously with closure of this checklist		
15 Provide additional parking or bike storage facilities	IM	Y	50+	Lift restricted one person at a time. Stairs to come down only		
16 Reduce congestion at entry/exit points	IM	Y	50+	Space available under desk and cubboards.		
17 Provide additional storage for bags/clothes	IM	Y	50+	Lift restricted one person at a time. Stairs to come down only		
18 Use markings and introduce one way flow at entry and exit points	IM	Y	50+	Hand Sanitizers at all entry/exit points		
19 Provide handwashing facilities on hand sanitizers when not possible at entry/exit points	IM	Y	50+	To be enforced by communication to staff on site. No access to kitchens		
20 Defining process alternatives for entry/exit points where appropriate, for example, deactivating turnstiles requiring pass checks in favour of showing a pass to security personnel at a distance.	IM	Y	50+	Restriction on desks being rotated where possible but deep cleaned each night in any case.		
21 Reducing movement by discouraging non-essential trips within buildings	IM	Y	50+	Lift restricted one person at a time. Hand sanitizers at all entry/exit points		
22 Restricting access between different areas	IM	Y	50+	To be enforced by communication to staff on site. No access to kitchens		
23 Reducing job and location rotation	Line Managers	Y	50+	Restriction on desks being rotated where possible but deep cleaned each night in any case.		
24 Reducing maximum occupancy in lifts, providing hand sanitizer for the operation of lifts and encouraging use of stairs wherever possible.	IM	Y	50+	Lift restricted one person at a time. Hand sanitizers at all entry/exit points		This will be communicated to staff over the coming days
25 Regulating use of high traffic areas including corridors/lifts/turnstiles and walkways to maintain social distancing.	Line Managers	Y	50+	Staggering arrival times and staggering break times and tape		
26 Workplaces and Workstations	IM	Y	50+	2 meter distance between each desk		
27 Review layouts and processes to allow people to work further apart from each other.	IM	Y	50+	Tape and desk allocation - See floorplan		
28 Using floor tape or paint to mark areas to help workers keep to a 2m distance.	IM	Y	50+	Limited desks to shared but not within same working day. Daily Deep Cleaning		
29 Avoiding use of hot desks and spaces and, where not possible, for example, call centres or training facilities, cleaning workstations between different occupants including shared equipment.	IM	Y	50+	Limited desks to shared but not within same working day. Daily Deep Cleaning		
Meetings						
30 Using remote working tools to avoid in-person meetings.	All	Y	50+	In place with Microsoft Teams		
31 Only absolutely necessary participants should attend meetings and should maintain 2m separation throughout	All	Y	50+	In place		
32 Avoiding transmission during meetings, for example avoiding sharing pens and other objects.	All	Y	50+	In place		
33 Providing hand sanitizer in meeting rooms.	IM	Y	50+	Restricted to one person at a time		
34 Holding meetings outdoors or in well-ventilated rooms whenever possible.	IM	Y	50+	Social distancing tape is laid out to define safe areas		
35 For areas where regular meetings take place, using floor signage to help people maintain social distancing.	IM	Y	50+	Social distancing tape is laid out to define safe areas		
Common Areas						
36 Staggering break times to reduce pressure on break rooms or canteens.	Line Managers	Y	50+	No common break out areas will be available to staff. Only restrooms.		
37 Using safe outside areas for breaks.	N/A	Y	50+	No outside areas within office		
38 Create additional space by using other parts of the workplace or building that have been freed up by remote working.	IM	Y	50+	In place - See floorplan.		
39 Providing hand sanitiser in all fully opening staff canteens.	IM	Y	50+	No staff canteens and lockers to be closed to staff.		
40 Encouraging workers to bring their own food.	All	Y	50+	Included in HR file's		
41 Encouraging staff to remain on site and, when not possible, maintaining social distancing while off-site.	All	Y	50+	Guidance to staff advises maintaining social distancing at all times		
42 Reducing use of locker rooms, changing areas and other facilities areas to reduce concurrent usage.	IM	Y	50+	Restricted to one person at a time		
43 Encouraging storage of personal items and clothing in personal storage bags, for example, lockers and during shifts.	IM	Y	50+	Storage facilities already provided		
Managing Customers, Visitors and Contractors						
44 Limiting the number of visitors at any one time.	IM	Y	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
45 Where site visits are required, site guidance on social distancing and hygiene should be explained to visitors on or before arrival.	IM	Y	50+	Risk Assessment to be shared.		
46 Limiting visitor times to a specific time window and restricting access to required visitors only.	IM	N/A	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
47 Determining if schedules for essential services and contractor visits can be revised to reduce interaction and overlap between people, for example, carrying out services at night.	IM	Y	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
48 Maintaining a record of all visitors, if this is practical.	IM	Y	50+	BAU		
49 Revising visitor arrangements to ensure social distancing and hygiene, for example, where someone physically signs in with the same pen in reception.	IM	Y	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
50 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.	IM	Y	50+	Risk Assessment to be shared.		
51 Establishing host responsibilities relating to COVID-19 and providing any necessary training for people who act as hosts for visitors.	IM	N/A	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
52 Revising entry and exit routes for visitors and contractors to minimise contact with other people.	IM	N/A	50+	Visitors not currently admitted. Contractors only outside of normal working hours.		
53 Coordinating and working collaboratively with landlords and other tenants in multi-tenant sites, for example, shared working spaces.	IM	Y	50+	Risk assessment to be shared with Punjab National Bank.		
Cleaning/Hygiene						
54 Increase office ventilation where possible.	IM	Y	50+	All HVAC services have been increased and are regularly maintained		
55 Frequent cleaning of work areas and equipment between uses, using your usual cleaning products.	IM	Y	50+	Housekeepers maintain cleaning standards throughout the day		Additional cleaning materials provided at Tea Points
56 Frequent cleaning of objects that are touched regularly, such as door handles and keyboards, and making sure there are adequate disposal arrangements.	IM	Y	50+	Housekeepers maintain cleaning standards throughout the day		
57 Clearing workspaces and removing waste and belongings from the work area at the end of a shift.	IM	Y	50+	Clear Desk Policy still adhered to and waste collection on a daily basis.		
58 Limiting or restricting use of high-touch items and equipment, for example, printers or whiteboards.	IM	Y	50+	Signage to advise, plus PPE for staff to use when required		
59 Using signs and posters to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.	IM	Y	50+	Posters in place		
60 Providing regular reminders and signage to maintain personal hygiene standards.	IM	Y	50+	Posters in place		
61 Providing hand sanitiser in multiple locations in addition to washrooms.	IM	Y	50+	In all washrooms and entry/exit points		
62 Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible.	IM	Y	50+	Only one person admitted at a time with regular cleaning throughout the day		
63 Enhancing cleaning for busy areas.	IM	Y	50+	Increased cleaning throughout the day		
64 Providing more waste facilities and more frequent rubbish collection.	IM	Y	50+	Bins available outside all bathrooms and collected daily		
65 Providing hand dryer facilities - either paper towels or electrical dryers. 21	IM	Y	50+	In place		
Showers/Changing Facilities						
66 Where shower and changing facilities are required, setting clear use and cleaning guidance for showers, lockers and changing rooms to ensure they are kept clean and clear of personal items and that social distancing is achieved as much as possible.	IM	Y	50+	Only one person admitted at a time with regular cleaning throughout the day		
67 Introducing enhanced cleaning of all facilities regularly during the day and at the end of the day.	IM	Y	50+	Increased cleaning throughout the day		
Handling goods, merchandise and other materials						
68 Cleaning procedures for goods and merchandise entering the site.	IM	Y	50+	PPE is being used for the handling of urgent items, non-urgent items are left for 24 to 48 hours before being opened.		Measures in place but enhancements to be determined iteratively
69 Cleaning procedures for vehicles.	IM	N/A	50+	No vehicles owned		
70 Introducing greater handwashing and hand sanitising facilities for workers handling goods and merchandise and providing hand sanitiser where this is not practical.	IM	Y	50+	Hand sanitizers and bathrooms widely available		
71 Restricting non-business deliveries, for example, personal deliveries to workers.	IM	Y	50+	BAU		
Shift Patterns and Working Groups						
72 As far as possible, where staff are split into teams or shift groups, fixing these teams or shift groups so that where contact is unavoidable, this happens between the same people.	Line Managers	Y	50+	Desks are deep cleaned prior to staff rotation and staff communication makes it clear no contact between individuals.		
73 Identifying areas where people directly pass things to each other, for example office supplies, and finding ways to remove direct contact, such as using drop-off points or transfer zones.	IM	Y	50+	Premises to coordinate as needed		
Work Related Travel						
74 Minimising non-essential travel - consider remote options first.	Line Managers	Y	50+			
75 Minimising the number of people travelling together in any one vehicle, using fixed travel partners, increasing ventilation when possible and avoiding sitting face-to-face.	All	Y	50+	Staff all travel individually		
76 Where workers are required to stay away from their home, centrally logging the stay and making sure any overnight accommodation meets social distancing guidelines.	IM	Y	50+	Apartments for one staff member only		
Deliveries to other sites						
77 Putting in place procedures to minimise person-to-person contact during deliveries to other sites.	N/A	N/A	50+			
78 Maintaining consistent pairing where two-person deliveries are required.	N/A	N/A	50+			
79 Minimising contact during payments and exchange of documentation, for example, by using electronic payment methods and electronically signed and exchanged documents.	N/A	N/A	50+			
Communications and Training						
80 Providing clear, consistent and regular communication to improve understanding and consistency of ways of working.	HR	Y	50+	Regular email communication with all staff, in all locations.		
81 Engaging with workers and worker representatives through existing communication routes to explain and agree any changes in working arrangements.	HR	Y	50+	Regular email communication with all staff, in all locations.		
82 Developing communication and training materials for workers prior to returning to site, especially around new procedures for arrival at work.	COO/IM	Y	50+	Regular engagement with Line Managers.		
83 Ongoing engagement with workers (including through trades unions or employee representative groups) to monitor and understand any unforeseen impacts of changes to working environments.	HR	Y	50+	Regular email communication with all staff, in all locations.		
84 Awareness and focus on the importance of mental health remains of opportunity. The government has published guidance on the mental health and wellbeing aspects of coronavirus (COVID-19).	HR	Y	50+	Regular email communication with all staff, in all locations.		
85 Using simple, clear messaging to explain guidelines using images and clear language, with consideration of groups for which English may not be their first language.	HR	Y	50+	Regular email communication with all staff, in all locations.		
86 Using visual communications, for example, whiteboards or signage, to explain changes to schedules, breakdowns or materials shortages to reduce the need for face-to-face communications.	IM	Y	50+	Signage available in all relevant areas.		
87 Communicating approaches and operational procedures to suppliers, customers or trade bodies to help their adoption and to share experience.	All	Y	50+	Client liaison ongoing		
Inbound and Outbound Goods						
88 Revising pick-up and drop-off instructions points, procedures/signage and markings.	IM	Y	50+	The rear entrance is used and is kept separate from staff movements.		
89 Minimising unnecessary contact at gatehouse security, yard and warehouse. For example, non-contact deliveries where the nature of the product allows for use of electronic pre-bookings.	N/A	Y	50+	ABC House does not have such an area		
90 Considering methods to reduce frequency of deliveries, for example by ordering larger quantities less often.	IM	Y	50+	In place		
91 Where possible, using safe, having single workers load/unload vehicles.	N/A	Y	50+	No vehicles owned		
92 Where possible, using the same pairs of people for loads where more than one is needed.	IM	Y	50+	One one Premises staff on site		
93 Enabling drivers to access welfare facilities when required consistent with other guidance.	IM	Y	50+	Facility in the lower ground floor away from site and also maintained by cleaning team		
94 Encouraging drivers to stay in their vehicles where this does not compromise their safety and existing safe working practice, such as preventing drive-aways.	IM	Y	50+	In place		