Working Safely During Covid-19 Risk Assessment

Contents

Version Control

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Executive Summary

Overall, Think Money Limited have reacted appropriately and proportionally to the Covid-19 pandemic. It is clear from the strength of the controls in place that the business has correctly prioritised and taken proportionate actions in order to achieve the following:

- ✔ The on-going safety and wellbeing of all colleagues
- ✔ The continued provision of products, features and services to customers
- ✔ The continued adherence to regulatory and legal obligations
- ✔ The continuation of innovation and enhancements to the product offerings, technology platforms and resiliency
- ✔ The continued financial health and continued viability of the business

The business has achieved this by implementing a suite of effective controls in order to mitigate the key causes that would lead to a crystallisation of the risks associated with Covid-19. At a high level the controls have ensured that:

- ✔ Government guidance and developments are constantly monitored, analysed and then discussed amongst appropriate stakeholders
- ✔ Critical services, processes and functions have been identified and protected
- ✔ Colleagues who do not need to attend the site to work are now working remotely
- ✔ High risk colleagues are either working remotely, or where this isn't possible, they have been temporarily furloughed
- ✔ There are strict levels of social distancing and hygiene practices in place around the site for colleagues and visitors
- ✔ The site is thoroughly and frequently cleaned and sanitised each day
- ✔ Colleagues remaining on site work in set teams and shifts in order to limit the risk of transmission
- ✔ There are strict levels of distancing and cleaning in place for goods being delivered to the site
- ✔ Colleagues are able to travel to work safely and securely via numerous different methods
- ✔ Sensitive colleague data has been captured, used, stored and deleted compliantly and the data rights of the colleagues has been maintained throughout

As a result of the businesses actions, the principle risk resulting from Covid-19 has been residually rated as:

Residual Risk	Score	Rationale
Likelihood	**Unlikely**	The monitoring and governance in place, along with the identification and protection of critical services, processes and functions, the on-site health and safety measures and the minimal number of colleagues attending the site mean that there is only small chance that the business will fail to act appropriately and in a timely manner to the Covid-19 pandemic
Impact	**Minor**	Any impacts resulting from Covid-19 will be minimal, resulting in some minor delays to the usual timescales for calls and some customer requests. Regulatory and legal obligations will continue to be adhered to and there will be no issues with colleague safety or wellbeing. The business remains viable and will continue to invest in the products, technology platforms and the general resilience of the business
Overall	**Minor**	**Although some minor changes can be made to further enhance the businesses response to this pandemic, there is no immediate risk to colleagues, customers, regulatory/legal compliance or the on-going viability of the business at this time**

The remainder of this document outlines how the business identified and then subsequently assessed the various risks resulting from the Covid-19 pandemic.

Introduction

Covid-19 is a new virus of the coronavirus family. This originated in China in December 2019 and has since spread across the globe, infecting over 11.5 million people and killing over 500,000[1]. This has been labelled as a pandemic by the World Health Organisation on the 11th February 2020[2].

The best method of controlling the virus so far has been enforcing social distancing amongst the population, with keeping people 2m away from each other being universally accepted as the most effective measure. Many countries enforced lockdowns of the population – meaning people can only leave their homes for exercise, shopping, collecting medicine and to attend work, if they cannot work from home.

The UK has been in lockdown since the 23rd March, with non-essential businesses asked to close. Essential businesses, of which financial services is included, were advised to stay open but with workers encouraged to work from home where possible. Where workers cannot work from home, business are required to make the working environment as safe as possible for the staff who need to remain on site.

Think Money Limited have enabled most of the workforce to be able to work remotely, however due to the complexity of the Call Centre telephony solution, the Call Centre staff have to remain on-site until a new solution can be implemented, which is expected to be early July.

The government has acknowledged the need to both protect the public but also the economy during this pandemic. To that end, the government released guidance for multiple sectors on how to make sure that workplaces are safe environments, including offices and call centres, in order to allow them to safely reopen and continue to provide their services.

Using this guidance, alongside other key developments identified during the pandemic, Think Money Limited have completed a risk assessment to ascertain the risk of the business failing to react appropriately to the pandemic. This has allowed the business to rate the risk of the business not responding to the pandemic effectively and the potential impacts of this based on the effectiveness of the controls in place to adhere to the government guidance. This has then been used to prioritise resource and efforts to any controls that are not fully effective as well as providing assurance to both internal and external stakeholders that Think Money Limited are acting appropriately and proportionally and have staff safety and customer outcomes at the heart of their operations.

As there is the likelihood that some controls may deteriorate, either due to staff complacency, government initiatives or further guidance, this risk assessment will be completed at frequent intervals to provide constant assurance of the control effectiveness and, ultimately, the level of risk the business is exposed to.

[1] Source: https://coronavirus.jhu.edu/map.html
[2] Source: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/events-as-they-happen

Principle Risk

Think Money Limited are defining the risk as:

"The business fails to react appropriately to Covid-19 guidance and developments, leading to staff safety issues, a loss/reduction of operations, regulatory/legal breaches and severe reputational damage."

When a business scores risks, this is typically done twice to enable the business understand how essential the controls are in mitigating the risk and the potential likelihood and impacts should the controls fail:
- Inherent Risk – The likelihood of the risk occurring and the potential impacts of this if there were no mitigating controls in place
- Residual Risk – The likelihood of the risk occurring and the potential impacts of this factoring in the effectiveness of the mitigating controls that are in place

Below is the Inherent Risk scores determined by Think Money Limited:

Inherent Risk	Score	Rationale
Likelihood	**Very Likely**	There is an 50%-90% chance that this risk would crystallize within the next 12 months
Impact	**Critical**	A large proportion of the staff would fall ill, the business would be unable to fulfil its operations leading to severe customer detriment, there would be severe action taken by regulators/legal bodies and there could be widespread reputational damage via local, if not national, media outlets.

Risks

The principle risk has been split into sub-risks covering each aspect of how the business should be responding to the pandemic. This allows the business to see which element of the principle risk need attention and therefore allowing the business to prioritise resource and efforts effectively in order to reduce the overall risk level. The sub-risks are:

Risk Reference	Risk Description
COV01	The business is unaware of key Covid-19 developments and/or does not have suitable arrangements in place to determine the most appropriate course of actions, leading to a higher likelihood of staff being unsafe, key processes not being fulfilled and regulatory/legal breaches occurring
COV02	The business is unaware of its critical services, processes and functions, leading to a higher likelihood that there are issues in providing and maintaining these causing customer harm and regulatory/legal breaches
COV03	Staff are unnecessarily asked to continue attending the office for work, particularly those who are high risk, leading to a higher likelihood of a colleague becoming infected and/or spreading the virus amongst other staff
COV04	Staff who are working in the office are not practicing social distancing, increasing the risk of the virus spreading among staff
COV05	Visitors to the site are not advised of the office social distancing guidelines, increasing the risk of them introducing the virus to the office
COV06	The office is not cleaned thoroughly or often enough, increasing the risk that staff contract the virus from unhygienic surfaces and equipment
COV07	Work is not organised into distinct groups in order to reduce staff contact, increasing the risk of the virus spreading among staff
COV08	Social distancing and cleaning is not in place for goods entering the site, increasing the risk of surface transmission to staff

Risk Reference	Risk Description
COV09	Staff are unable to attend the site, or attend at the usual times, due to travel restrictions, increasing the risk that customers cannot be serviced and key tasks cannot be completed
COV10	The business captures data on employees health conditions in a non-compliant manner, resulting in Data Protection breaches leading to regulator action

Each of these sub-risks will be given a residual likelihood and impact score based on the effectiveness of the controls in place for them. The scoring will be one of the following:

Likelihood	Description	Impact	Description
Remote	There is a <2% chance of impacts occurring outside of appetite within the next 12 months	**Low**	0 staff are infected, minimal impacts to operational processes, very minor breach of voluntary codes/guidance, limited social media coverage
Unlikely	There is a 2% - 10% chance of impacts occurring outside of appetite within the next 12 months	**Minor**	Up to 5% of staff are infected, minor impacts to operational processes, limited breach of voluntary codes/guidance, short term social media coverage
Likely	There is a 10% - 50% chance of impacts occurring outside of appetite within the next 12 months	**Moderate**	Up to 10% of staff are infected, moderate impacts to operational processes, breach of regulation/law, extended local/social media coverage
Very Likely	There is a 50% - 90% chance of impacts occurring outside of appetite within the next 12 months	**High**	More than 10% of staff are infected, major impacts to operational processes, reportable breach of regulations/laws, extended national media coverage
Almost Certain	There is a >90% chance of impacts occurring outside of appetite within the next 12 months	**Critical**	More than 25% of staff are infected, critical impacts to operational processes, severe and reportable breach of regulations/laws, regular and consistent national media coverage

Each of the above sub-risks will have a suite of controls in place to reduce the likelihood of the risk occurring and/or minimising the impacts where it does occur. These controls will be rated using the following system, which will allow the business to further understand where resource and efforts should be allocated to best minimise the overall risk:

Control Rating	Description
Gap	The control is required to reduce the risk however is not currently in place – the business should seek to implement this control as soon as possible
Ineffective	The control does not help to reduce the risk – the business should invest resources to improve this control as soon as possible
Partly Effective	The control helps to reduce the risk – the business should invest resources to improve this control in the near future

Control Rating	Description
Fully Effective	The control effectively reduces the risk – no further action is required
Future Control	The control may be needed as more staff return to the office, more of the business reopens or as the government continues to ease the lockdown measures
Not Applicable	Due to the nature of the business and its operations the control is not applicable

Risk Assessment

The business has conducted assessments of the controls below to determine the effectiveness of these. This has been conducted utilising a number of approaches in order to ensure that the ratings chosen are as accurate as possible and are not overly reliant on opinions or attestations.

The controls ratings are accurate as of the 7th July 2020.

COV01

The business is unaware of key Covid-19 developments and/or does not have suitable arrangements in place to determine the most appropriate course of actions, leading to a higher likelihood of staff being unsafe, key processes not being fulfilled and regulatory/legal breaches occurring

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV01-01	The business has a colleague nominated to watch the governments daily briefing to keep up to date with new advice	Fully Effective	The business has nominated the Head of Risk to attend the daily briefings and report back in the afternoon SMT Meeting	
COV01-02	The business attends key working groups to understand interpretations of guidance and identify best practice within the industry	Fully Effective	The Director of Operations attends the UK Finance Working Groups in place	
COV01-03	The Senior Management team attend regular meetings to discuss key developments and determine actions and responses	Fully Effective	The SMT attend meetings twice every weekday to discuss developments, guidance and review business performance	
COV01-04	The wider management team attend regular meetings to discuss how each area may have been impacted by key developments and actions	Fully Effective	The wider management team attend weekly meetings to discuss developments, guidance and review business performance	
COV01-05	The business regularly meets with the other tmg businesses to share knowledge and best practice on key guidance and initiatives	Fully Effective	The Chief Risk Officer meets with peers from each business pillar every two weeks to discuss developments and guidance	
COV01-06	The business will adhere to any requirements set out by enforcement agencies in the event of a localised lockdown, with robust plans in place to respond to these measures	Fully Effective	The lessons learnt from the initial lockdown event ensure that the business can and will react swiftly to any localised lockdowns or other actions	Create a localised lockdown procedure document detailing the likely steps and considerations that will need to be made

COV02

The business is unaware of its critical services, processes and functions, leading to a higher likelihood that there are issues in providing and maintaining these causing customer harm and regulatory/legal breaches

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV02-01	The business has identified the critical business services required to ensure customers can continue to access the products, features and services offered	Fully Effective	The business worked with function leads to understand what processes they operate, how this is done, the severity of each process, the timescales that need to be adhered to and the number of staff required to operate them	
COV02-02	The business has identified the critical staff, technology and suppliers required to maintain business services to the required levels	Partly Effective	Although the business has intimate knowledge of the staff, technology and suppliers that are needed to operate critical business services, the documentation of this is fragmented	To implement a configuration management database to document the links and dependencies of critical business services
COV02-03	The business has identified the impact tolerances for each of these business services to understand what priority is needed to return these in the event of an incident	Fully Effective	The business understands the impacts of downtime for key business services, using calls, complaints and payment volume impacts to determine the priority of these services being resumed	
COV02-04	Where key business services rely on staff, the business has, where possible, worked to ensure these can be operated either autonomously or that customers can self-serve	Fully Effective	A number of new digital features have been added to the App and communicated with customers, with a notable reduction in call volumes experienced as a result	
COV02-05	The business continuously works to enhance the resilience of all key components that make up the critical business services	Fully Effective	The business has medium to long term plans in place to enhance resiliency via remote working and cloud based connectivity	
COV02-06	The business continually assess its processes to determine what enhancements can be made to enhance the efficiency of these	Fully Effective	The business has been constantly reviewing all processes and a number of enhancements have been implemented via the BOM Working Group	
COV02-07	The business frequently monitors and engages with key suppliers who are involved in the provision of critical business services	Fully Effective	The business reaches out to critical suppliers on a weekly basis and maintains regular governance with all other suppliers	

COV03

Staff are unnecessarily asked to continue attending the office for work, particularly those who are high risk, leading to a higher likelihood of a colleague becoming infected and/or spreading the virus amongst other staff

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV03-01	All staff who can work remotely are sent to work from home	Fully Effective	All staff who can reasonably work from home have been sent home	
COV03-02	The business only operates with the minimum number of staff on-site to operate the business effectively	Fully Effective	Only the Call Centre and a small number of Technology staff remain on-site	
COV03-03	Staff working from home have their wellbeing monitored and are kept in touch with colleagues working on-site	Fully Effective	Managers and Team Leaders have regular virtual 1-2-1's and huddles with their teams to provide updates and keep in touch	
COV03-04	The business keep in touch with all offsite workers to monitor their working arrangements, welfare, mental and physical health and personal security	Fully Effective	Managers and Team Leaders have regular virtual 1-2-1's and huddles with their teams to provide updates and keep in touch	
COV03-05	Staff working from home are provided with the equipment needed to work safely and effectively	Fully Effective	All staff sent to work remotely were given DSE guidance, remote working guidance, laptops and given the option of monitors, mice, chairs and stands if needed	
COV03-06	Staff are provided support around mental health and wellbeing	Fully Effective	All staff have been reminded of the Health Assurance partners, who are independent to the business and can provide further support to colleagues	
COV03-07	The business is aware of which staff are in the clinically extremely vulnerable and clinically vulnerable groups	Fully Effective	The business captured this data via a survey followed up with conversations by managers to obtain further information where necessary	
COV03-08	The business allows staff who are self-isolating to work from home where its reasonable	Partly Effective	The business has ensured that all staff but the Call Centre have the ability to work remotely	Obtain all hardware and software to enable the Call Centre to work remotely if required by the 31/07
COV03-09	The businesses sick pay policy is aligned with the governments guidance	Fully Effective	The existing sick pay allows colleagues to receive full pay for 10 sick days per annum	
COV03-10	The business provides the correct and relevant guidance to staff who have or live with those who have symptoms	Fully Effective	The business has given repeated instructions to staff to self-isolate for 7 or 14 days if they have/live with someone with symptoms	
COV03-11	The business understands and takes into account the circumstances of those with protected characteristics	Fully Effective	Existing processes and policies ensure that staff with protected characteristics are treated fairly and equally	
COV03-12	The business involves and communicates appropriately with workers whose protected characteristics may expose them to greater harm	Fully Effective	Existing processes and policies ensure that staff with protected characteristics are treated fairly and equally	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV03-13	The business makes reasonable adjustments to ensure equality in the workplace during Covid-19	Fully Effective	Existing processes and policies ensure that staff with protected characteristics are treated fairly and equally	
COV03-14	The business makes reasonable adjustments to avoid disabled workers being put at a disadvantage, including the health and safety of new and expectant mothers	Fully Effective	Existing processes and policies ensure that staff with protected characteristics are treated fairly and equally	
COV03-15	The business ensure the steps taken do not have an unjustifiable negative impacts on some groups compared to others	Fully Effective	Existing processes and policies ensure that staff with protected characteristics are treated fairly and equally	

COV04

Staff who are working in the office are not practicing social distancing, increasing the risk of the virus spreading among staff

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV04-01	The business staggers arrival and departure times to reduce crowding into and out of the office	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-02	The business provides additional parking and facilities for bikes to be stored	Fully Effective	With the number of staff currently on site there is ample parking space and bike racks available for staff	
COV04-03	The business limits the number of passengers on the business minibus	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-04	The business reduces congestion by having multiple entry points to the building	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-05	The business provides ample storage for staff clothing and belongings	Fully Effective	All colleagues have personal lockers and drawers for their belongings	
COV04-06	The business uses floor markings and introduces one way systems at entry and exit points	Fully Effective	Floor tape is in place throughout the buildings to encourage social distancing	
COV04-07	The business provides handwashing facilities or hand sanitiser at entry and exit points and limits touchpads	Fully Effective	There are wall mounted hand sanitisers near all entrances/exits	
COV04-08	The business provides alternatives to touch based security to get access to the office and floors	Fully Effective	The business has revolving entry doors and fob pass doors that do not require touching anything	
COV04-09	The business defines alternatives for entry and exit points and asks staff to show passes to personnel to gain entry instead of using pass terminals	Future Control	With the low number of staff on-site this is not necessary at this time	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV04-10	The business discourages non-essential trips between floors, utilising pass restrictions where necessary	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-11	The business restricts access between building within the site	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-12	The business reduces job and location rotation	Fully Effective	The staff on site all have set desks and areas where they will work	
COV04-13	The business has more one way flows through buildings	Fully Effective	Where possible, one way systems are in place and signed out using floor markings	
COV04-14	The business has reduced maximum lift occupancy and provides hand sanitiser when they are being used	Fully Effective	Lifts are restricted to one person at a time using signage and floor markings	
COV04-15	The business ensures that those with disabilities can continue to use lifts	Fully Effective	The lifts are available and suitable to those with disabilities	
COV04-16	The business regulates the use of high traffic areas to maintain social distancing	Fully Effective	Floor markings and signage encourage distancing in the kitchen and printer areas of the business	
COV04-17	The business has reviewed the layouts and processes in place to allow people to work further apart from each other	Fully Effective	All staff are at working at least 2m from their colleagues, with none working next to corridors or walkways	
COV04-18	The business uses floor tape to assist colleagues in maintaining 2m distances	Fully Effective	Floor tape is in place throughout the buildings to encourage social distancing	
COV04-19	The business has arranged for staff to work side by side or back to back where they cannot work far apart	Fully Effective	No staff are working face to face, with them working side by side, back to back or diagonally from each other with 2m distances between them	
COV04-20	The business utilises screens to separate staff working in closer proximity	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-21	The business actively monitors and managers occupancy levels to enable social distancing	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-22	The business avoids the use of hot desks and spaces and where unavoidable conducts cleaning and sanitisation between uses	Fully Effective	All staff have their set desks and these are not used by other colleagues	
COV04-23	The business utilises remote working tools to avoid meetings	Fully Effective	The business has given all staff access to Zoom and Slack to conduct meetings remotely	
COV04-24	Meetings are restricted to essential attendees and they are spaced out to allow 2m distancing	Fully Effective	With the low number of staff in the office and the nature of the roles meetings are at a minimum and distancing can be practiced	
COV04-25	The business does not allow staff to share pens and other objects within meetings	Fully Effective	Signs and guidance is available to staff to remind them of this during meetings	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV04-26	The business provides hand sanitiser in all meeting rooms	Fully Effective	All meeting rooms are now fitted with hand sanitiser stations	
COV04-27	Where possible, the business holds meetings in outdoor or well ventilated areas	Fully Effective	Huddles with the teams take place on the open floor, which is well ventilated and spaced out	
COV04-28	The business uses floor signage in meeting rooms to help staff maintain social distancing	Fully Effective	Floor markings and signage are in place in all meeting rooms	
COV04-29	The business works closely with other tenants to ensure consistency in approaches	Fully Effective	Facilities are in regular contact with the other tenants to agree approaches	
COV04-30	The business staggers break times to reduce pressure on break areas	Future Control	The café is currently closed	
COV04-31	The business allows staff to take breaks outdoors	Fully Effective	Staff are welcome to use the outdoor areas to take breaks	
COV04-32	The business utilises space freed up from those working remotely	Fully Effective	The business is currently utilising a vacant building to enable further social distancing	
COV04-33	The business has installed screens to protect staff in reception and similar areas	Future Control	With the low number of staff on-site this is not necessary at this time	
COV04-34	The business provides pre-packaged meals to staff	Fully Effective	Pre-packed meals are provided to all staff working on site	
COV04-35	The business encourages staff to bring their own food to work	Not Applicable	As the business provides pre-packed meals this is not required	
COV04-36	The business has reconfigures seating and table layouts to maintain social distancing	Future Control	The café is currently closed	
COV04-37	The business encourages staff to remain on-site for breaks	Fully Effective	Guidance has been issues to all staff on site to encourage them to stay on site throughout the day	
COV04-38	The business regulates the use of locker rooms, changing areas and other facilities	Future Control	The gym is currently closed	
COV04-39	The business encourages staff to store their belongings in lockers and other personal storage areas	Fully Effective	All staff have their own personal lockers and drawers and are encouraged to use these to store personal belongings	
COV04-40	The business ensures that there is no music, television or other noise in place within the office that could lead to staff having to raise their voices	Fully Effective	Only Call Centre staff are on site, they are well spaced out so are not talking over each other and there are no radios or televisions in the office area	

COV05

Visitors to the site are not advised of the office social distancing guidelines, increasing the risk of them introducing the virus to the office

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV05-01	The business encourages visits to be performed remotely where possible	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-02	The business provides guidance on distancing and hygiene before arrival to required visitors	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-03	The business limits the number of concurrent visitors	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-04	The business limits visitors to specific time windows where possible	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-05	The business has revised schedules for essential service and contractor visits where possible	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-06	The business maintains a record of all visitors to the site	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-07	The business has made signing in of all visitors contactless	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-08	The business has provided clear guidance on distancing and hygiene for all people arriving at the site	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-09	The business has trained all staff who are likely to act as hosts for visitors	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-10	The business has reviewed the entry and exit routes for visitors	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	
COV05-11	The business works collaboratively with other tenants on shared spaces	Fully Effective	Only essential visitors are allowed on site and there are strict procedures and guidance in place for these visits	

COV06

The office is not cleaned thoroughly or often enough, increasing the risk that staff contract the virus from unhygienic surfaces and equipment

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV06–01	The business has services and adjusted the ventilations systems based on occupancy	Fully Effective	The HVAC providers conduct regular maintenance and servicing	
COV06-02	The business has sought advice from HVAC engineers on the operation of the HVAC solutions	Fully Effective	The HVAC providers have advised the system is safe and configured correctly	
COV06-03	The business opens windows and doors to encourage ventilation	Not Applicable	The business does not have windows or doors that can be opened	
COV06-04	All work areas and equipment is cleaned between use	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	
COV06-05	Objects and surfaces that are touched regularly are cleaned frequently	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	
COV06-06	All waste and belongings are removed from workspaces at the end of shifts	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	
COV06-07	Printers are whiteboard usage has been restricted where possible	Fully Effective	Printing is kept at a minimum and the printer areas has signage and sanitisation equipment to wide down after use	
COV06-08	The business has knowledge of the deep clean process should there be a suspected case on site	Fully Effective	Cleaning specialists are on standby to perform the required cleaning should there be a confirmed case on site	
COV06-09	The business has signs and posters to give awareness of good handwashing practices and general hygiene practices for sneezes and coughs	Fully Effective	Signs and posters are prominently displayed around the workplace	
COV06-10	The business has signs in place to remind staff of personal hygiene standards	Fully Effective	Signs and posters are prominently displayed around the workplace	
COV06-11	The business provides hand sanitisers in multiple locations as well as washrooms	Fully Effective	Hand sanitiser stations are located at all doors and soap dispensers are available in toilets and kitchen areas	
COV06-12	The business has clear use and cleaning guidance in place for toilets	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	
COV06-13	The business performs enhanced cleaning of busy areas	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV06-14	The business has increased the number of waste facilities and collects these more often	Fully Effective	Cleaning specialists conduct thorough cleaning of all work areas throughout the day	
COV06-15	The business provides electrical dryers and paper towels for hand drying	Fully Effective	The business has electric dryers in all toilets and paper towels in the kitchen areas	
COV06-16	The business has clear use and cleaning processes in place for showers, lockers and changing rooms including the staff clearing their belongings	Future Control	The gym and associated shower and changing facilities are currently closed	
COV06-17	The business performs enhanced cleaning of all facilities more frequently throughout and at the end of the day	Future Control	The gym and associated shower and changing facilities are currently closed	
COV06-18	The business has cleaning procedures in place for good being received into the business	Fully Effective	Teams receiving post have been provided with PPE for dealing with post	
COV06-19	The business has cleaning procedures for vehicles	Fully Effective	Business minibuses are cleaned frequently throughout the day, with deep cleaning now in place.	
COV06-20	The business has greater handwashing and facilities for handwashing for staff who handle goods	Fully Effective	Signs and posters are prominently displayed around the workplace and guidance has been issued to all staff	
COV06-21	The business regularly cleans vehicles that staff have taken home	Not Applicable	The business does not utilise shared company cars that are taken home	
COV06-22	The business has restricted non-business deliveries	Fully Effective	Personal deliveries can only be delivered to the Amazon locker on site and not to the post room – further guidance has been issued to staff to only collect as they are leaving	

COV07

Work is not organised into distinct groups in order to reduce staff contact, increasing the risk of the virus spreading among staff

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV07-01	Staff are split into fixed teams and shift groups to ensure any contact is with the same group	Fully Effective	Staff working on site are split into teams that have the same shifts and sit together	
COV07-02	The business has drop off zones in place where staff are required to pass things to each other	Fully Effective	Outbound post is left in a post box on the floor where it is collected from	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV07-03	The business has minimised non-essential travel, utilising remote tools where possible	Fully Effective	All staff have email, phone, Slack and Zoom to enable them to speak to other colleagues without travelling	
COV07-04	The business minimises the number of staff who travel together in vehicles	Future Control	The current volumes of staff using the business minibuses are not an issue at this time	
COV07-05	The business ensure that vehicles shared by staff are cleaned between shifts and handovers	Fully Effective	Business minibuses are cleaned frequently throughout the day, with deep cleaning now in place.	
COV07-06	The business records where staff have to stay away from home and ensure the accommodation meets social distancing guidelines	Not Applicable	Staff are not required to stay in accommodation for business	
COV07-07	The business has procedures in place to minimise contact during deliveries to the site and between buildings	Fully Effective	Staff receiving post deliveries have been given PPE gloves to handle these	
COV07-08	The business maintains consistent pairings for two person delivery collections	Fully Effective	Small number of staff receiving deliveries	
COV07-09	The business minimises contact during the exchange of delivery documentation and signing	Fully Effective	All deliveries are contactless where possible	
COV07-10	The business has clear and consistent guidance that can be given staff before they return to the office	Fully Effective	The business has clear guidance that can be issued to staff prior to them returning to the site	
COV07-11	The business regularly engages with those not working on site to keep them informed of new practices in working arrangements	Fully Effective	All managers and team leaders keep in regular contact with staff working from home and who are furloughed to make them aware of onsite changes	
COV07-12	The business has communications and training materials for those workers returning to the site on procedures in place	Fully Effective	The business has clear guidance that can be issued to staff prior to them returning to the site	
COV07-13	The business regularly engages with staff to monitor and understand the impacts of the new procedures	Fully Effective	The management team meet each week where new on site changes are discussed and challenged	
COV07-14	The business promotes awareness and focus on the importance of mental health to staff	Fully Effective	All staff have been made aware of the independent Health Assurance business who can help	
COV07-15	The business uses simple and clear messaging, including images and clear language, to explain all guidelines and considers those where English is not their first language	Fully Effective	All signs are easy to read and understand with the use of visuals and colours to aid understanding	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV07-16	The business uses visual communications to explain changes to scheduling, breakdowns or shortages	Fully Effective	All signs are easy to read and understand with the use of visuals and colours to aid understanding	
COV07-17	The business regularly shares communications with suppliers and customers to help adoption and share best practice	Fully Effective	The business engages with all suppliers on a weekly basis	
COV07-18	The business keeps records of all rotas, shifts and attendance records for at least 21 days so that they can trace colleague movement and potential interactions	Fully Effective	The resource planner stores historical rotas and shift information, colleague attendance is captured in MyView and via register each day and colleague movement through the site can be tracked via door fobs	

COV08

Social distancing and cleaning is not in place for good entering the site, increasing the risk of surface transmission to staff

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV08-01	The business has revised pick-up and drop-off collection points and procedures along with signage and markings	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless where possible and no personal deliveries are allowed to the post room	
COV08-02	The business has minimised contact at the gatehouse where possible	Fully Effective	A new protective screen has now been implemented at the gatehouse	
COV08-03	The business has reduced the frequency of deliveries where possible, including more infrequent but larger stock orders	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless where possible and no personal deliveries are allowed to the post room	
COV08-04	The business ensures that a minimal number of staff are involved in unloading deliveries	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless where possible and no personal deliveries are allowed to the post room	
COV08-05	The business ensures that the same staff are involved in two person unloading	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
		Fully Effective	where possible and no personal deliveries are allowed to the post room	
COV08-06	The business provides access to welfare facilities for delivery drivers	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless where possible and no personal deliveries are allowed to the post room	
COV08-07	The business encourages drivers to stay in their vehicles where possible	Fully Effective	Only essential deliveries are being received, PPE has been provided to those receiving deliveries, deliveries are all contactless where possible and no personal deliveries are allowed to the post room	

COV09

Staff are unable to attend the site, or attend at the usual times, due to travel restrictions, increasing the risk that customers cannot be serviced and key tasks cannot be completed

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV09-01	The business has minimised the number of staff who need to attend the site to work	Fully Effective	All staff who can work from home are now working from home, with only the Call Centre and a select few from Technology still attending the site	
COV09-02	The business has provided guidance to staff who need to use public transport to attend the site	Fully Effective	Guidance issued to all staff on site via the FAQ following the Facilities assessment	
COV09-03	The business has ample parking arrangements in place to accommodate those staff driving to the site	Fully Effective	Due to the low number of staff on-site there is sufficient parking to allow any who want to drive to park on-site	
COV09-04	The business has bike storage facilities in place for those staff who choose to cycle to work	Fully Effective	The business has three bike racks available for staff to securely store their bikes and lockers for storing equipment	
COV09-05	The business has shower and changing facilities open for those staff who cycle or walk to work	Fully Effective	The shower and changing rooms are currently closed	

COV10

The business captures data on employee's health conditions in a non-compliant manner, resulting in Data Protection breaches leading to regulator action

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV10-01	Where the business collects employee data regarding if they have symptoms or have been confirmed to have Covid-19, this is only kept for as long as needed to protect the rest of the workforce	Fully Effective	Data captured is done so via telephone call and then stored within MyView and a permission restricted SharePoint library – the data is updated with the current status on a daily basis	
COV10-02	The business ensures that only colleagues who have been in close proximity to a colleague with symptoms/a confirmed case are advised of who that colleague was	Fully Effective	Where a case is confirmed or suspected, colleagues who have worked in close proximity would be notified. The wider workforce will be notified of a case but in a manner where it is not easy to identify the individual	
COV10-03	The business ensure that colleagues are made aware that they are being monitored/tracked and the purpose for this, and this is only done to trace where Covid-19 may have been spread	Fully Effective	The employee privacy policy is available to all employees and explains the lawful purposes for processing this data, in that this is necessary due to health and safety at work obligations	
COV10-04	All colleagues are informed of any data collection and why this is being collected throughout the pandemic	Fully Effective	The employee privacy policy is available to all employees and explains the lawful purposes for processing this data, in that this is necessary due to health and safety at work obligations	
COV10-05	There are processes in place to allow colleagues to exercise their rights under GDPR whilst this data is being collected	Fully Effective	Colleagues can exercise their rights under GDPR and there are clear processes for this which can be found in the employee privacy policy	
COV10-06	All data captured is stored securely and kept confidential	Fully Effective	The data is stored both in MyView, which is an internal HR system with role based permissions and access, and SharePoint, which has restricted access permissions in place managed by the Head of Risk	
COV10-07	The business minimise the level of personal data captured to ensure only necessary and proportionate data is captured	Fully Effective	The business will only capture data on colleagues health where there is a need to do this based on Health & Safety in the workplace. Where this is done, as little information as possible is captured	

Control Reference	Control Description	Rating	Rationale	Proposed Action(s)
COV10-08	Where testing of colleagues is required the business will conduct a Data Protection Impact Assessment to ensure that the GDRP obligations are met	Future Control	If the business determines that it wants to test staff for illness and/or immunity	

Residual Risk Scores

Based on the effectiveness of the controls listed above, the current residual risk scores for the six identified risks can be found in the table below:

Risk Reference	Risk Description	Likelihood	Impact	Overall	Actions
COV01	The business is unaware of key Covid-19 developments and/or does not have suitable governance arrangements in place to determine the most appropriate course of actions, leading to a higher likelihood of staff being unsafe, key processes not being fulfilled and regulatory/legal breaches occurring	Remote	Low	Low	
COV02	The business is unaware of its critical services, processes and functions, leading to a higher likelihood that there are issues in providing and maintaining these causing customer harm and regulatory/legal breaches	Unlikely	Minor	Minor	Implement and complete a full configuration management database for all critical business services (31/08)
COV03	Staff are unnecessarily asked to continue attending the office for work, particularly those who are high risk, leading to a higher likelihood of a colleague becoming infected and/or spreading the virus amongst other staff	Unlikely	Minor	Minor	
COV04	Staff who are working in the office are not practicing social distancing, increasing the risk of the virus spreading among staff	Unlikely	Minor	Minor	Enable the Call Centre to be able to work remotely (31/07)

Risk Reference	Risk Description	Likelihood	Impact	Overall	Actions
COV05	Visitors to the site are not advised of the office social distancing guidelines, increasing the risk of them introducing the virus to the office	Remote	Low	Low	
COV06	The office is not cleaned thoroughly or often enough, increasing the risk that staff contract the virus from unhygienic surfaces and equipment	Unlikely	Low	Minor	
COV07	Work is not organised into distinct groups in order to reduce staff contact, increasing the risk of the virus spreading among staff	Unlikely	Low	Minor	
COV08	Social distancing and cleaning is not in place for good entering the site, increasing the risk of surface transmission to staff	Unlikely	Low	Minor	
COV09	Staff are unable to attend the site, or attend at the usual times, due to travel restrictions, increasing the risk that customers cannot be serviced and key tasks cannot be completed	Unlikely	Low	Low	
COV10	The business captures data on employee's health conditions in a non-compliant manner, resulting in Data Protection breaches leading to regulator action	Remote	Low	Low	