

Coronavirus (Covid 19) Pandemic Risk Assessment

Date of Review: 1/8/2025
 Assessment Carried out by: James Maidment
 Assessment Date: 1/8/2025

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 |
|--|--------------------------|---|--|--------------------|----------------------------|-------------|
| Hand Washing. | | | | | | |
| 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. | | | | |
| Cleaning/Hygiene | | | | | | |
| 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. | Y | | |
| Spread of Covid 19 | 50+ | Restricting the use of high-touch items. ie copiers, printers etc | Extra Housekeeper to ensure all extra disinfecting duties are carried out. 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 | | |
| Social Distancing Measures | | | | | | |
| 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 | |
| PPE | | | | | | |
| 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 | | |
| Mental Health. | | | | | | |
| 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 | | |
| Symptoms of Coronavirus (Covid 19). | | | | | | |
| 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 | |
| Testing | | | | | | |
| 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 | | |
| Single Point of Contact - SPOC | | | | | | |
| 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 |
|--|----------------------------|
| 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 |
| Prevent the FCA receiving information about a firm. | Y |
| 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 ES Register | Y |
| Affect the ability of the firm to oversee its functions including any outsourced functions. | Y |
| Cause detriment to consumers. | Y |
| Damage the integrity of the market. | Y |
| Increase the risk of financial crime. | Y |
| 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 |
| 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 |
| A firm can cascade policies and procedures to reduce any potential for financial crime arising from its working arrangements. | Y |
| An appropriate culture can be put in place and maintained in a remote working environment. | Y |
| 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 |
| The nature, scale and complexity of its activities, or legislation, does not require the presence of an office location. | Y |
| 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 |

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| 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 |
| It has appropriate record keeping procedures in place. | Y |
| 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 |
| The firm has considered the effect on staff, including wellbeing, training and diversity and inclusion matters. | Y |
| Where any staff will be working from abroad the firm has considered the operational and legal risks. | N/A |

| Additional Comments | Further Controls Required | Implemented |
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| No change in Head Office building location | N/A | N/A |
| No restrictions to sending information requested by FCA. We have successfully maintained close contact with our regulators throughout the Pandemic. | N/A | N/A |
| No impact on customer contact | N/A | N/A |
| No impact on oversight of functions, including outsourced services | N/A | N/A |
| Customer Complaints have been dealt with as BAU | N/A | N/A |
| N/A | N/A | N/A |
| Financial Crime controls in place and functioning as usual | N/A | N/A |
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| All plans are reviewed by CMT prior to changes to operating model being implemented | N/A | N/A |
| 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 |
| 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 |
| Promotion of a positive work culture continued throughout the Pandemic and under our current Hybrid working model. | N/A | N/A |
| 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 |
| 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 |
| We have a robust and secure VPN capability which allows over 90% of staff to work remotely. | N/A | N/A |

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| This has been assessed and staff are frequently reminded of their responsibilities relating to data, cyber and security risks. | N/A | N/A |
| All record keeping procedures are in place and adhered to. | N/A | N/A |
| We maintain all monitoring activities appropriate to our business model. | N/A | N/A |
| This was a major area of focus for both the CMT and HR teams throughout the Pandemic and continues under our <u>current Hybrid working model</u> . | N/A | N/A |
| No employees working abroad as BAU | N/A | N/A |

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Please note all below requirements are currently suspended however would be

| Checklist of Government Guidance for Working Safely During Covid - 19 in offices and contact |
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| Action Required |
| General |
| Complete Risk Assessment |
| Who should go to work |
| Planning for minimum number of staff needed on site to work safely |
| Monitor wellbeing of staff working from home and help them stay connected to the rest for the workforce |
| Keeping in touch with off-site workers |
| Provide equipment to enable staff to work from home safely |
| Provide support for workers around mental health and wellbeing |
| Enabling workers to work from home when self-isolating if appropriate |
| Understanding and taking into account the particular circumstances of those with different protected characteristics. |
| 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. |
| Considering whether you need to put in place any particular measures or adjustments to take account of your duties under the equalities legislation. |
| Making reasonable adjustments to avoid disabled workers being put at a disadvantage, and assessing the health and safety risks for new or expectant mothers. |
| 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. |
| Social Distancing In the Workplace |
| Implement two meter social distancing measures in the office (applies to all parts of the business) |
| Coming to Work and Leaving Work |
| Stagger arrival and departure times |
| Provide additional parking or bike storage facilities |
| Reduce congestion at entry/exit points |
| Provide additional storage for bags/clothes |
| Use markings and introduce one way flow at entry and exit points |
| Provide handwashing facilities or hand sanitisers where not possible at entry/exit points |
| 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. |
| Movement around buildings and worksites |
| Reducing movement by discouraging non-essential trips within buildings |
| Restricting access between different areas |
| Reducing job and location rotation |
| Reducing maximum occupancy in lifts, providing handsanitiser for the operation of lifts and encouraging use of stairs wherever possible. |
| Regulating use of high traffic areas including corridors, lifts turnstiles and walkways to maintain social distancing. |
| Workplace and Workstations |
| Review layouts and processes to allow people to work further apart from each other. |
| Using floor tape or paint to mark areas to help workers keep to a 2m distance. |
| 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. |
| Meetings |

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| Using remote working tools to avoid in-person meetings. |
| Only absolutely necessary participants should attend meetings and should maintain 2m separation throughout |
| Avoiding transmission during meetings, for example, avoiding sharing pens and other objects. |
| Providing hand sanitiser in meeting rooms. |
| Holding meetings outdoors or in well-ventilated rooms whenever possible. |
| For areas where regular meetings take place, using floor signage to help people maintain social distancing. |
| Common Areas |
| Staggering break times to reduce pressure on break rooms or canteens. |
| Using safe outside areas for breaks. |
| Creating additional space by using other parts of the workplace or building that have been freed up by remote working. |
| Providing packaged meals or similar to avoid fully opening staff canteens. |
| Encouraging workers to bring their own food. |
| Encouraging staff to remain on-site and, when not possible, maintaining social distancing while off-site. |
| Regulating use of locker rooms, changing areas and other facility areas to reduce concurrent usage. |
| Encouraging storage of personal items and clothing in personal storage spaces, for example, lockers and during shifts. |
| Managing Customers, Visitors and Contractors |
| Limiting the number of visitors at any one time. |
| Where site visits are required, site guidance on social distancing and hygiene should be explained to visitors on or before arrival. |
| Limiting visitor times to a specific time window and restricting access to required visitors only. |
| 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. |
| Maintaining a record of all visitors, if this is practical. |
| Revising visitor arrangements to ensure social distancing and hygiene, for example, where someone physically signs in with the same pen in receptions. |
| 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. |
| Establishing host responsibilities relating to COVID-19 and providing any necessary training for people who act as hosts for visitors. |
| Reviewing entry and exit routes for visitors and contractors to minimise contact with other people. |
| Coordinating and working collaboratively with landlords and other tenants in multi-tenant sites, for example, shared working spaces. |
| Cleaning/Hygiene |
| Increase office ventilation where possible |
| Frequent cleaning of work areas and equipment between uses, using your usual cleaning products. |
| Frequent cleaning of objects and surfaces that are touched regularly, such as door handles and keyboards, and making sure there are adequate disposal arrangements. |
| Clearing workspaces and removing waste and belongings from the work area at the end of a shift. |
| Limiting or restricting use of high-touch items and equipment, for example, printers or whiteboards. |
| 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. |
| Providing regular reminders and signage to maintain personal hygiene standards. |
| Providing hand sanitiser in multiple locations in addition to washrooms. |
| Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible. |
| Enhancing cleaning for busy areas. |
| Providing more waste facilities and more frequent rubbish collection. |
| Providing hand drying facilities – either paper towels or electrical dryers. 21 |
| Showers/Changing Facilities |

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.

Introducing enhanced cleaning of all facilities regularly during the day and at the end of the day.

Handling goods, merchandise and other materials

Cleaning procedures for goods and merchandise entering the site.

Cleaning procedures for vehicles.

Introducing greater handwashing and handwashing facilities for workers handling goods and merchandise and providing hand sanitiser where this is not practical.

Restricting non-business deliveries, for example, personal deliveries to workers.

Shift Patterns and Working Groups

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.

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.

Work Related Travel

Minimising non-essential travel – consider remote options first.

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.

Where workers are required to stay away from their home, centrally logging the stay and making sure any overnight accommodation meets social distancing guidelines.

Deliveries to other sites

Putting in place procedures to minimise person-to-person contact during deliveries to other sites.

Maintaining consistent pairing where two-person deliveries are required.

Minimising contact during payments and exchange of documentation, for example, by using electronic payment methods and electronically signed and exchanged documents.

Communications and Training

Providing clear, consistent and regular communication to improve understanding and consistency of ways of working.

Engaging with workers and worker representatives through existing communication routes to explain and agree any changes in working arrangements.

Developing communication and training materials for workers prior to returning to site, especially around new procedures for arrival at work.

Ongoing engagement with workers (including through trades unions or employee representative groups) to monitor and understand any unforeseen impacts of changes to working environments.

Awareness and focus on the importance of mental health at times of uncertainty. The government has published guidance on the mental health and wellbeing aspects of coronavirus (COVID-19).

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.

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.

Communicating approaches and operational procedures to suppliers, customers or trade bodies to help their adoption and to share experience.

Inbound and Outbound Goods

Revising pick-up and drop-off collection points, procedures, signage and markings.

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-booking.

Considering methods to reduce frequency of deliveries, for example by ordering larger quantities less often.

Where possible and safe, having single workers load or unload vehicles.

Where possible, using the same pairs of people for loads where more than one is needed.

Enabling drivers to access welfare facilities when required, consistent with other guidance.

Encouraging drivers to stay in their vehicles where this does not compromise their safety and existing safe working practice, such as preventing drive-aways.

re-introduced in the event of incre

| centres | | |
|---------------|-----------------|----------------|
| Responsible | Implemented Y/N | #Staff at Risk |
| | | |
| JB/MC | Y | 50+ |
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| MC | Y | 50+ |
| AS | Y | 50+ |
| AS | Y | 50+ |
| JM/JB | Y | 50+ |
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| JM | Y | 50+ |
| JM | Y | 50+ |

ased infection rates and/or government lockdown

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| Evidence If necessary |
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| Approved by CMT |
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| Spreadsheet on Minimum/Maximum Staff by Department |
| Regular Line Manager and HR communication with staff |
| Regular Line Manager and HR communication with staff |
| Spreadsheet |
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| Communication to staff |
| Database with HR, collated with input from Line Managers |
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| Extremely vulnerable excluded from return to work |
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| Communication to staff |
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| Communication to staff |
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| Communication to staff |
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| Tape and desk allocation - See floorplan |
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| Communication to line managers to ensure staggering of staff being submitted simultaneously with closure of this checklist. |
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| Lift restricted one person at a time. Stairs to come down only. |
| Space available under desk and cupboards. |
| Lift restricted one person at a time. Stairs to come down only. |
| Hand Sanitizers at all entry/exit points |
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| To be enforced by communication to staff on site |
| To be enforced by communication to staff on site. No access to kitchens |
| Restriction on desks being rotated where possible but deep cleaned each night in any case. |
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| Lift restricted one person at a time. Hand Sanitizers at all entry/exit points. |
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| Staggering arrival times and staggering break times and tape |
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| 2 meter distance between each desk |
| Tape and desk allocation - See floorplan |
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| Limited desks to shared but not within same working day. Daily Deep cleaning . |
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| In place with Microsoft Teams |
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| In place |
| Air conditioning available in all meeting rooms |
| Social distancing tape is laid out to define safe areas |
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| No common break out areas will be available to staff. Only teapoints. |
| No outside areas within office |
| In place. See floorplan. |
| No staff canteens and kitchens to be closed to staff. |
| Included in HR faq's |
| Guidance to staff advises maintaining social distancing at all times |
| Restricted to one person at a time |
| Storage facilities already provided |
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| Visitors not currently admitted. Contractors only outside of normal working hours. |
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| Risk Assesment to be shared. |
| Visitors not currently admitted. Contractors only outside of normal working hours. |
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| Visitors not currently admitted. Contractors only outside of normal working hours. |
| BAU |
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| Visitors not currently admitted. Contractors only outside of normal working hours. |
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| Risk Assesment to be shared. |
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| Visitors not currently admitted. Contractors only outside of normal working hours. |
| Visitors not currently admitted. Contractors only outside of normal working hours. |
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| Risk assesment to be shared with Punjab National Bank. |
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| All HVAC services have been increased and are regularly maintained |
| Housekeepers maintain cleaning standards throughout the day |
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| Housekeepers maintain cleaning standards throughout the day |
| Clear Desk Policy still adhered to and waste collection on a daily basis. |
| Signage to advise, pus PPE for staff to use when required |
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| Posters in place |
| Posters in place |
| In all washrooms and entry/exit points |
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| Only one person admitted at a time with regular cleaning throughout the day |
| Increased cleaning throughout the day |
| Bins available outside all bathrooms and collected daily |
| In place |
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| Only one person admitted at a time with regular cleaning throughout the day |
| Increased cleaning throughout the day |
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| PPE is being used for the handling of urgent items, non-urgent items are left for 24 to 48 hours before being opened. |
| No vehicles owned |
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| Hand sanitizers and bathrooms widely available |
| BAU |
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| Desks are deep cleaned prior to staff rotation and staff communication makes it clear no contact between individuals |
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| Premises to coordinate as needed |
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| Staff all travel individually |
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| Apartments for one staff member only |
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| Regular email communication with all staff, in all locations. |
| Regular email communication with all staff, in all locations. |
| Regular engagement with Line Managers. |
| Regular email communication with all staff, in all locations. |
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| Regular email communication with all staff, in all locations. |
| Signage available in all relevant areas. |
| Client liaison ongoing |
| |
| The rear entrance is used and is kept separate from staff movements |
| |
| ABC House does not have such an area |
| In place |
| No vehicles owned |
| One one Premises staff on site |

Facility in the lower ground floor away from site and also maintained by cleaning team

In place

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