

## COVID-19 Response and Risk Assessment

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The impact of COVID-19 is being felt across the globe and is challenging our ways of living and working – and we've had to adapt, fast.

Since the very first indications of what was to come, our priority has been the health and safety of our people and continuing to provide a seamless service to our customers and partners.

Our Executive team meets weekly to respond to the frequent changes in government advice (both in the UK and internationally where we have call centres), check on the health and wellbeing of our teams, and ensure we are meeting the needs of our valued partners and customers.

I am proud of how quickly we have responded as a company. We had as many employees as possible working remotely and our corporate offices closed prior to the Government lockdown being announced. Our IT and call centre management teams worked round the clock to enable as many call centre agents as possible to work from home in a fully compliant way. As a result of these robust business continuity plans, it has remained business as usual across Comparison Tech.

As UK lockdown restrictions begin to ease, this document outlines how we will work safely during COVID-19 and our proposed approach to reopening our offices in a number of phases, while of course, adhering to the latest government advice.

In these uncertain times, our mission remains to give **everyone** access to brilliant deals, and our focus is on ensuring our teams can do this safely.

Stay safe and well,

Julie Harris

# A considered and planned return to our offices

In line with the latest Government guidelines the majority of our employees are working remotely.

We continue to review our approach and plan to re-open our offices when we can safely.

#### Our business-critical call centre

Offline sales are a vital channel for our customers across both our energy and telecoms business verticals.

Thanks to the amazing efforts of our call centre management and IT teams, the majority of our call centre agents are now working from home with only a small number, who are not able to, remain in the office.

In our Telecoms business, we take payment from customers over the phone, and this can only be done in a compliant PCI DSS environment. We have a fully compliant homeworking solution; which means we are able to still support our partners whilst ensuring the safety of our people.

We are currently in the process of working with our call centre teams to design a future blended approach, where we will be able to accommodate both home and office working.

#### **Re-opening our offices**

Currently the guidance is that those who can work from home should continue to do so, and **we fully support this approach.** Once the government determines that it is safe to open more workplaces, we will re-open our offices in a careful and staged way for those that would prefer to return to an office environment.

We anticipate that during this period a number of our employees will continue to work from home.

As well as physical health and safety, the mental health and well-being of our employees is paramount. We continue to consult widely with our teams and are aware that some of our employees are keen to return to an office environment as soon as they can and we would like to facilitate this, when possible, under Government advice

In the meantime, we are designing the future of our work spaces, operating structure and locations in partnership with our employees. We know that we can successfully run the business with most people working from home, and so flexibility will be very much part of the way we operate the business from now on. We have learnt a lot about working remotely and we want to continue with all the good things we have experienced - more flexibility; less commuting; better for the environment and more time with family – but we also recognise it is not for everyone and so we will strike a balance.

At this time, it's impossible to say exactly when this will be, and our timing on this will be driven by government guidance.

## **Our Blueprint**

Ensuring a safe environment, firstly in our business-critical call centre, and then across our other offices as they re-open is of paramount importance.

Throughout the past year we have implemented many new safety measures across all locations.

#### 1. Protecting high risk employees

Employees that have been identified as 'clinically vulnerable' (as defined by government) will not be returning to the office until government advice says it is safe for them to do so and are currently working remotely.

Any employee that displays any symptoms of COVID-19 will stay at home and self-isolate for 10 days from the day that they first displayed symptoms. In addition, any employee that lives with someone that has symptoms will self-isolate for 10 days and not come into the office. We have introduced a COVID-19 response plan to track and trace any employee who has symptoms or who tests positive.

Our team of Mental Health First Aiders are available to support any employee, whether they are returning to the office or continuing to work from home, during these uncertain times.

#### 2. Making our offices COVID-19 secure

#### Social distancing

To limit contact between employees we have introduced a number of precautions:

- Invested in more office space to ensure that individuals are able to remain socially distant at all times, as well as limiting the number of people who can be in each office at one time.
- Fixed shift patterns and seating plans to reduce the number of colleagues our employees come into contact with over this period and ensure they remain 2 metres apart at all times in the office.
- > One-way paths marked-out around the offices and entrance and exits, to avoid contact and face masks to be worn when employees are not seated at their desks.
- > Screens between lines of desks to ensure face-to-face distancing.
- > Multiple water and coffee stations provided to avoid pressure points in the offices.
- > Communal areas, such as lockers, seating areas and games areas are not in use.
- Employees are asked to eat at their desk or outside in a designated area with seating appropriately positioned to adhere to social distancing.
- > We have introduced a new desk booking system for when we can re-open our offices so that employees who want to attend on an ad hoc basis can reserve a desk whilst assisting us in controlling the number of people in each location at one time.

#### **Cleaning and hygiene**

- > Deep cleaning take place every evening.
- > Workspaces, toilets and kitchens are cleaned between shifts.
- Hand sanitiser is available throughout the office, in toilets, kitchens and at tea/coffee stations. Employees are being encouraged to use this regularly.
- > Anti-bac wipes on every desk so employees can wipe down their own workstation at the start and end of their shift, in addition to enhanced cleaning measures.
- Employees are requested to take all personal items home each evening to leave clear desks for deep cleaning.

#### Temperature checks

We have installed thermal camera technology at all sites which requires employees to have their temperature checked before entering the office.

#### Lateral flow tests

All employees who work in the office regularly have been given packs of Lateral Flow tests to take home with them and are asked to carry out a test twice a week before attending the office. We also have tests available for any employees who need to attend the office less frequently.

#### 3. Deploying technology to support secure remote working

Our IT team quickly facilitated the mobilisation of staff in all our offices to be able to work from home securely and to stay in contact with one another, replicating as far as possible our collaborative team environment.

- All agents can operate from home on secure-build laptops that have the same security standards as the desktop machines in the office PCI environment.
- Laptops have virus and malware protection installed and connect back to the office via cloud technology or VPN.
- Employees are able to request additional equipment to be sent to their home address to support remote working e.g. monitors and keyboards.
- > We utilise applications such as Slack and Microsoft Teams to enable real time communication and to maintain the important social and cultural communication across our business; we will continue to run a number of creative and stimulating activities.
- We are running all our meetings via Zoom and Teams with Q&A features added for company team events.
- Our proxy maintains Data Loss Prevention for Personally Identifiable Information and our Intrusion Detection Systems keep our core services safe.
- Sales call recording for agents still takes place for compliance purposes and credit card details are not logged. We have implemented AsterLogic AgenTrak for real time process monitoring.
- We have increased the frequency of vulnerability scans on all systems from monthly to fortnightly and are remedying issues highlighted immediately. Our Cyber Essentials certificate was renewed following a successful scan in March.

#### 4. New policies and ways of working to keep everyone safe

#### Meetings, visitors and deliveries

- > All external meetings will be conducted virtually.
- Internal meetings will take place virtually wherever possible. If a face-to-face meeting is essential, it will be held outside or in a well-ventilated room observing social distancing.
- Service providers (cleaners) will be allocated a specific window to attend site when there are no or few employees around.

#### Employee health and wellbeing

- Before returning to the office all employees will receive detailed guidance on the new measures that have been implemented in each office and new protocols e.g. wearing masks around the office, fixed worked stations.
- > We hold monthly company updates for all employees to attend and send regular e-mail communications in which we share our understanding of the latest guidance from the government and the NHS on COVID-19 and relay any new or amended internal guidance or instructions.
- > Posters are displayed on handwashing techniques, social distancing reminders etc.
- Wellbeing and mental health resources are available to all employees, on the company training platform, via a dedicated Health Hub on Slack and through frequent communications. We have also tripled the number of trained internal Mental Health First Aiders available and offer an enhanced private medical benefit for all employees to utilise for physical, emotional and mental wellbeing.
- > We have introduced social channels on Slack and Teams for people with shared interests to connect as well as designed and distributed a support guide to provide all employees with tips on how to look after their heath and manage their work life balance whilst working remotely.
- Managers have been trained in COVID-19 safety awareness as well as how to manage and coach their teams effectively whilst working remotely.
- > We have introduced a Temporary Working from Home policy providing guidance to all employees regarding how to look after themselves safely whilst working from home.
- > All employees have been assigned virtual First Aid training to help look after themselves and their families safely at home.

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| NCREASING CONSEQUENCE | 2     | 2       | 4       | 6  | 8        | 10    |
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| Hazards  | Risk<br>rating<br>L x C = R |   | ng | Current risk<br>controls  | New riskAdditional risk controlsratingL x C = R  |
|--|-----------------------------|---|----|---|--|
| Infectious diseases<br>Covid-19 is a new illness that<br>can affect your lungs and<br>airways. It is caused by a<br>virus called Coronavirus.<br>Symptoms can be mild,<br>moderate, severe or fatal.<br>Employee and others,<br>business continuity, loss of<br>business / production.<br>Cross contamination<br>Financial impact<br>Future of company<br>Future of current<br>employee status | 4                           | 4 | 16 | <ul> <li>Employees who<br/>suspect they may<br/>be unwell are<br/>required to stay<br/>away from work<br/>and follow the<br/>government self-<br/>isolation<br/>procedures and<br/>company sickness<br/>absence reporting<br/>procedures.</li> <li>Line managers will<br/>offer support to<br/>employees<br/>affected by Covid<br/>19.</li> <li>Internal<br/>communications<br/>and cascade of<br/>messages will be<br/>carried out.</li> </ul> | <ul> <li>Meetings</li> <li>Meetings will be conducted virtually wherever possible. Where face to face meetings are needed these should take place outside or in well ventilated rooms maintaining social distancing.</li> <li>Symptoms of Covid 19</li> <li>Clinically Vulnerable and Vulnerable employees will be identified with individual risk assessments completed and will remain at home following government guidelines.</li> <li>Employees will be reminded of self-isolation requirements if they or a member of their family display any Covid-19 symptoms.</li> <li>Non-touch thermal camera thermometers will be provided for employee that has recently been in the office and has developed Covid-19, we will conduct a Covid Risk Assessment, identify people who have been in contact with them and will take advice on any actions or precautions that should be taken.</li> <li>If advised that an employee or employee has developed Covid-19 and were recently on our premises (including where an employee has visited other workplace premises such as domestic premises), we will conduct a Covid Risk Assessment, identify people who have been has developed Covid-19 and were recently on our premises (including where an employee has visited other workplace premises such as domestic premises), we will conduct a Covid Risk Assessment, identify people who have been has developed Covid-19 and were recently on our premises (including where an employee has visited other workplace premises such as domestic premises), we will conduct a Covid Risk Assessment, identify people who have been has down and will take advice on any actions other workplace premises such as domestic premises), we will conduct a Covid Risk Assessment, identify people who have been has down and be taken.</li> </ul> |

| Hazards  | Risk<br>rating<br>L x C = R | Current risk<br>controls  | Additional risk controls  | New risk<br>rating<br>L x C = R |
|--|-----------------------------|---|---|---------------------------------|
|  |                             |   | <ul> <li>identify people who have been in contact<br/>with them and will take advice on any<br/>actions or precautions that should be taken.</li> <li>A room will be made available for anyone<br/>feeling unwell to ensure they isolate<br/>themselves immediately.</li> </ul>   |                                 |
|  |                             |   | RIDDOR reporting of COVID-19  |                                 |
|  |                             |   | <ul> <li>We will make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when: <ul> <li>An unintended incident at work has led to someone's possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence.</li> <li>A worker has been diagnosed as having COVID-19 and there is reasonable evidence that it was caused by exposure at work. This must be reported as a case of disease.</li> <li>A worker dies because of occupational exposure to coronavirus.</li> </ul> </li> </ul>  |                                 |
| Recontamination  | 4 4 16                      |   | Social Distancing Measures:   | 3 3 9                           |
| Employee and others,<br>Business Continuity, Loss of<br>business / production.<br>• Cross contamination<br>• Financial impact<br>• Future of company<br>• Future of current<br>employee status |                             | <ul> <li>Employees who<br/>suspect they may<br/>be unwell are<br/>required to stay<br/>away from work<br/>and follow normal<br/>sickness absence<br/>reporting<br/>procedures.</li> <li>Monitor reliable<br/>social media/news<br/>sites to help<br/>ensure current<br/>isolation, social<br/>distancing and<br/>home working<br/>arrangements<br/>remain current.</li> <li>Use home working<br/>(where possible)<br/>to help the need<br/>for close,<br/>proximity working.</li> <li>Ensure that all<br/>portable<br/>appliance items<br/>are suitably tested</li> </ul> | <ul> <li>Introduce flexible working hours to help accommodate staffing levels and help minimise congestion.</li> <li>Split shifts will be introduced to minimise the number of employees on site at any time.</li> <li>Identify walkways, using colour coded heavy duty floor tape or eye level signage.</li> <li>2m minimum demarcation zones using colour coded heavy duty floor tape or eye level signage. NB – different colored tape will be used for different tasks/areas supported by strategically positioned information posters.</li> <li>Provision of additional welfare stations to help alleviate congestion.</li> <li>Suitable signage to help identify any new welfare stations will be displayed.</li> <li>Establish separation between desks to maintain a 2m minimum distance between colleagues.</li> <li>Partitions will be placed around the buildings to provide additional protection.</li> <li>Supervisory personnel to monitor people's movements and actions to help ensure absolute compliance with new regimes.</li> </ul> |                                 |

| Hazards | Risk<br>rating<br>L x C = R | Current risk<br>controls  | Additional risk controls   | New risk<br>rating<br>L x C = R |
|---------|-----------------------------|---|--|---------------------------------|
|         |                             | and positioned<br>away from water<br>outlets and at<br>suitable heights.                    | <ul> <li>Introduce one door for entering and one door for exiting each building to reduce congestion/contamination.</li> <li>Government guidance on planning and making journeys safely will be communicated to employees via e-mail.</li> </ul>   |                                 |
|         |                             |   | Communal Areas   |                                 |
|         |                             |   | <ul> <li>All communal areas will be closed to include eating areas, coat hooks, recreational activities, communal showers, shared spaces.</li> <li>Employees will be asked to eat and drink at their desks or outside.</li> <li>A maximum of 2 people at a time will be able to use the smoking shelter – floor markers will be installed. Smoking breaks will be allocated.</li> <li>Introduce additional meal breaks/rest breaks to help minimise congestion and utilise outdoor seating areas ensuring that the same levels of supervisory monitoring to ensure compliance.</li> <li>Restrict movement to previously used "short cuts", thoroughfares, dedicated personnel to monitor employee movements during this period.</li> <li>Any recreational facilities (pool table, table tennis table etc) will be out of use.</li> </ul> |                                 |
|         |                             |   | Hygiene/ Cleaning /PPE   |                                 |
|         |                             | <ul> <li>Frequent cleaning<br/>and disinfecting of<br/>surfaces and<br/>objects.</li> </ul> | <ul> <li>Introduce additional cleaning regimes, contractor and in-house, ensuring that individuals have responsibility for their own workspace and any contracted cleaners give written instructions that minimum standards of personal protective equipment are worn by their operatives and are required to report any occurrences of ill-health.</li> <li>Have in place plans to provide personal protective equipment e.g. face masks, disposable gloves etc. if government guidelines indicate that this may be necessary. Provide training to employees on how to safely use PPE.</li> <li>Employees will be required to take their headsets, laptops and other equipment home at night to ensure a clear desk policy.</li> </ul>  |                                 |

| Hazards | Risk             | Current risk | Additional risk controls   | New risk |
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| Hazards |                  |              | <ul> <li>Additional risk controls</li> <li>Equipment must not be shared e.g. pens etc.</li> <li>Each workstation will be supplied with antibac wipes.</li> <li>Additional enclosed bins will be supplied to dispose of anti-bac wipes.</li> <li>Handwashing</li> <li>Provide additional hand sanitising stations and ensure that advisory posters relating to handwashing techniques are strategically placed around the premises.</li> <li>Keep a reasonable stock of cleaning/sanitary products available e.g. soap, paper towels, tissues.</li> <li>Employees will be required to take their headsets, laptops and other equipment home at night to ensure a clear desk policy.</li> <li>Equipment must not be shared e.g. pens etc.</li> <li>Each workstation will be supplied with antibac wipes.</li> <li>Additional enclosed bins will be supplied to dispose of anti-bac wipes.</li> <li>Double bagging measures will be implemented. Everyone will be provided with a bin liner to use for their personal rubbish. Bin liner to be placed in main bin at the end of shift.</li> <li>Doors and windows will be opened frequently to provide ventilation.</li> <li>Ensure taps and showers are run before offices open to avoid any legionella contamination.</li> <li>Training</li> <li>Employees will be consulted on the risk assessment plans and will receive a personal brochure on what has been put in place.</li> <li>Train first aiders in how to safely support employees including paying particular attention to handwashing.</li> <li>Ensure taps and showers are run before</li> </ul> |          |
|         |                  |              | <ul> <li>offices open to avoid any legionella contamination.</li> <li>In the event of a fire or other security incident employees do not have to stay 2m apart if it would be unsafe to do so.</li> </ul>  |          |

| Hazards   | Risk<br>rating<br>L x C = R  | Current risk<br>controls   | Additional risk controls  |   | New risk<br>rating<br>L x C = R |  |
|---|--|--|---|---|---------------------------------|--|
|   |  | <ul> <li>CT has a number<br/>of mental health<br/>first aiders<br/>available for<br/>employees to talk<br/>to.</li> <li>Company EAP<br/>scheme.</li> <li>A range of<br/>support material is<br/>available through<br/>the company E-<br/>Learning platform.</li> <li>Private medical<br/>plan in place with<br/>physical,<br/>emotional and<br/>mental wellbeing<br/>support.</li> </ul> | <ul> <li>Record any steps taken.</li> <li>Employee Well-being</li> <li>Reminders on how to contact MHFA team.</li> <li>Employees will be reminded on the external support via the company EAP scheme, e-learning platform and private medical benefit.</li> <li>Managers and HR will talk to employees to review effectiveness of these measures.</li> <li>Support employees using HSE stress management standards where work related issues present themselves <u>https://www.hse.gov.uk/stress/standards/</u></li> <li>Monitoring</li> <li>We will regularly review this risk assessment and update where necessary.</li> <li>We will listen to feedback from employees on suggestions and concerns and modify plans as needed.</li> <li>A monitoring record should be kept helping the company review procedures post pandemic.</li> </ul> |   |                                 |  |
| Building Checks<br>A complete check of the<br>following systems already in<br>place before employees are<br>allowed back on site. | Ing Checks       3       3       9       Fire Safety Systems         Ing Checks       3       3       9       • Regular         Ing systems already in before employees are       • Regular       • Regular         Inspections in place in all areas.       • A functional test of the fire detection systems (using multiple call points across the site) at each site.         • A full discharge test of the emergency |  | 2 3   | 6 |                                 |  |

| Hazards | Risk<br>rating<br>L x C = R | Current risk<br>controls | Additional risk controls  | New risk<br>rating<br>L x C = F |
|---------|-----------------------------|--------------------------|---|---------------------------------|
|         |                             |                          | <ul> <li>To reduce the risk of Legionella bacteria due to water systems not being used for an extended period.</li> <li>The systems should be thoroughly cleaned, flushed and disinfected.</li> <li>Statutory Inspections</li> <li>Any statutory inspections that were due or missed during lockdown will be arranged and completed before reopening any site. To include PAT testing if applicable.</li> </ul> |                                 |

| Assessors Name: | Wirehouse | Date of Assessment: | February 2021 |
|-----------------|-----------|---------------------|---------------|
|                 |           |                     |               |