



COMPARISON
TECHNOLOGIES

COVID-19 Response and Risk Assessment

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A message from our CEO



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 daily 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 phased approach to Return to Work



In line with the Government's three-phase approach to adjusting social distancing measures, we have developed a three-phase plan to opening our offices.

Phase 1: Re-opening 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, all call centre agents working on energy are now working from home and will continue to do so.

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 home-working solution, however, we recognise that some of our partners want the choice to have their calls answered in a secure call centre environment.

Therefore, the first phase of returning to work will be the reopening of our business-critical telecoms call centre at the end of May with appropriate safety measures in place.

All other employees will continue to work from home during this first phase.

Phase 2: Office reopening for limited employees at a time

As well as physical health and safety, the mental health and well-being of our employees is vitally important to us. We have consulted 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 enable this, when possible, under government advice.

Currently the guidance is that those that can work from home should continue to do so, and **we fully support that**. Once the government determines 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. As part of this, we will also be considering how people can travel to work.

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

Phase 3 – Wider reopening

A wider reopening would see all of us returning to working in our usual locations for some or all the time. At this time, it's impossible to say exactly when this will be, and our timing on this will be driven by government guidance.

However, what we do know is 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.

Our Blueprint

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

A dedicated project team, headed by our Chief Operating Officer Peter Callander, is ensuring all appropriate measures are in place. Here we outline some of the main safety precautions we are taking.

1. Protecting high risk employees
2. Making our offices safe
3. Reducing risk of transmission
4. Deploying technology to support remote working

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.

Any employee that displays any symptoms of COVID-19 should stay at home and self-isolate for 7 days from the day that they first displayed symptoms. In addition, any employee that lives with someone that has symptoms should self-isolate for 14 days and not come into the office.

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 safe



Social distancing

To limit contact between employees we are introducing a number of precautions:

- Distributing the team across four buildings on our Kent site to limit the number of people at each location.
- 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 whilst working.
- One-way paths marked-out around the offices and entrance and exits, to avoid contact, and face masks to be worn when entering and exiting the office.
- Screens between lines of desks to ensure face-to-face distancing.
- Multiple water & coffee stations will be provided to avoid pressure points in the offices
- Additional toilet facilities are being provided at each building.
- Employees have been asked to leave a space between their car and others, and car sharing has been suspended.
- Communal areas, such as coat hooks, lockers, seating areas and games areas are closed.
- Employees will be asked to eat at their desk or outside in a designated area with seating appropriately positioned to adhere to social distancing.

Cleaning and hygiene



- A deep clean will take place every evening.
- Workspaces, toilets and kitchens will be cleaned between shifts
- Hand sanitiser will be available on every desk, in toilets, kitchens and at tea/coffee stations. Employees are being encouraged to use this regularly.
- Anti-bac wipes and bins at 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 being asked to take laptops and equipment home each evening to leave clear desks for deep cleaning.

3. Reducing risk of transmission

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

Personal protective equipment



- We will supply face masks for employees to use as they circulate and come in and out of the building. Detailed guidance on how to use facemasks safely will be issued to all employees returning to work.

Employee communication on health and wellbeing



- Before returning to the office all employees will attend a virtual briefing meeting where they will receive detailed guidance on the new measures that have been implemented in the offices and new protocols e.g. wearing masks in certain areas of the offices, wiping down their workstation before and after use.
- Regular company updates give latest guidance from the government and NHS on Covid-19 symptoms and on personal health and hygiene measures to ensure individuals stay aware.
- Posters are displayed on handwashing technique, 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.

4. 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 & malware protection installed and connect back to the office via a VPN.
- All staff have access to Slack for real time communication and to maintain the important social & cultural communications of our business; we will continue to run a number of creative and stimulating activities.
- We are running all our meetings via Zoom & 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 and we are implementing 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 and our Cyber Essentials certificate was renewed following a successful scan in March

Appendix: Risk Assessment

<table border="1"><tr><td>5</td><td>5</td><td>10</td><td>15</td><td>20</td><td>25</td></tr><tr><td>4</td><td>4</td><td>8</td><td>12</td><td>16</td><td>20</td></tr><tr><td>3</td><td>3</td><td>6</td><td>9</td><td>12</td><td>15</td></tr><tr><td>2</td><td>2</td><td>4</td><td>6</td><td>8</td><td>10</td></tr><tr><td>1</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td></tr><tr><td></td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td></tr></table>	5	5	10	15	20	25	4	4	8	12	16	20	3	3	6	9	12	15	2	2	4	6	8	10	1	1	2	3	4	5		1	2	3	4	5	Likelihood	Consequences	Risk Rating
	5	5	10	15	20	25																																	
	4	4	8	12	16	20																																	
	3	3	6	9	12	15																																	
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	1	2	3	4	5																																		
1 – Very Unlikely	1 – Insignificant	1 – 4 Acceptable																																					
2 – Unlikely	2 – Minor	5 – 9 Adequate																																					
3 – Fairly Likely	3 – Moderate	10 – 16 Tolerable																																					
4 – Likely	4 – Major	17 – 25 Unacceptable																																					
5 – Very Likely	5 – Catastrophic																																						

Task Description	COVID 19 - RETURN TO WORK COMPARISON TECH	People Affected	Employees / Contractors / Visitors / New and Expectant Mothers / Young Persons / Vulnerable Employees
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Hazards	Risk rating L x C = R			Current Risk Controls	Additional Risk Controls	New Risk Rating L x C = R		
Infectious diseases Covid-19 is a new illness that can affect your lungs and airways. It is caused by a virus called Coronavirus. Symptoms can be mild, moderate, severe or fatal. Employee and others, Business Continuity, Loss of business / production. <ul style="list-style-type: none"> Cross contamination. Financial impact. Future of company. Future of current employee status. 	4	4	16	<ul style="list-style-type: none"> Employees who suspect they may be unwell are required to stay away from work and follow the government self-isolation procedures and company sickness absence reporting procedures. Line managers will offer support to employees affected by Covid 19. Internal communication and cascade of messages will be carried out. 	Meetings <ul style="list-style-type: none"> 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. Symptoms of Covid 19 <ul style="list-style-type: none"> Clinically Vulnerable and Vulnerable employees will be identified with individual risk assessments completed. Employees will be reminded of self-isolation requirements if they or a member of their family display any Covid 19 symptoms. Non touch thermometers will be provided for employees to use. Employees will be reminded weekly that if they or a household member is showing symptoms they should not come into the office. If we are aware that an employee that has recently been in the office has developed Covid-19, we will contact the Public Health Authority to discuss the case, identify people who have been in contact with them and will take advice on any actions or precautions that should be taken. https://www.publichealth.hscni.net/ A room on each site will be made available for anyone feeling unwell to ensure they isolate themselves immediately. 	3	3	9

Hazards	Risk rating			Current Risk Controls	Additional Risk Controls	New Risk Rating		
	L	x	C = R			L	x	C = R
					RIDDOR reporting of COVID-19 We will make a report under RIDDOR (The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) when: <ul style="list-style-type: none"> An unintended incident at work has led to someone's possible or actual exposure to coronavirus. This must be reported as a dangerous occurrence. 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. A worker dies because of occupational exposure to coronavirus. 			
Recontamination Employee and others, Business Continuity, Loss of business / production. <ul style="list-style-type: none"> Cross contamination. Financial impact. Future of company. Future of current employee status. 	4	4	16	<ul style="list-style-type: none"> Employees who suspect they may be unwell are required to stay away from work and follow normal sickness absence reporting procedures. Monitor reliable social media/news sites to help ensure current isolation, social distancing and home working arrangements remain current. Use home working (where possible) to reduce the need for close, proximity working. Ensure that all portable appliance items are suitably tested and positioned away from water outlets and at suitable heights. 	Social Distancing Measures: <ul style="list-style-type: none"> Introduce flexible working hours to help accommodate staffing levels and help minimise congestion. Split shifts will be introduced to minimise the number of employees on site at any time. Identify walkways, using colour coded heavy duty floor tape or eye level signage. A 2m minimum demarcation zones using colour coded heavy duty floor tape or eye level signage <i>NB – different coloured tape should be used for different tasks/areas supported by strategically positioned information posters.</i> Provision of additional welfare stations to help alleviate congestion. Suitable signage to help identify any new welfare stations will be displayed. Establish separation between desks to maintain a 2m minimum distance between colleagues. Partitions will be placed around the buildings to provide additional protection. Supervisory personnel to monitor people's movements and actions to help ensure absolute compliance with new regimes. Introduce one door for entering and one door for exiting each building to reduce congestion/contamination. 	3	3	9

Hazards	Risk rating L x C = R			Current Risk Controls	Additional Risk Controls	New Risk Rating L x C = R		
				<ul style="list-style-type: none"> Frequent cleaning and disinfecting of surfaces and objects. 	<ul style="list-style-type: none"> Car sharing will be temporarily suspended until safe to resume. Taxis will be provided where appropriate and within government guidelines. Transport timetables will be obtained from transport providers. Government guidance on planning and making journeys safely will be communicated to employees via posters and brochures. <p>Communal Areas</p> <ul style="list-style-type: none"> All communal areas will be closed to include eating areas, coat hooks, recreational activities, communal showers, shared spaces. Employees will be asked to eat and drink at their desks. A maximum of 3 people at a time will be able to use the smoking shelter – floor markers will be installed. Smoking breaks will be allocated. 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. Restrict movement to previously used “short cuts”, thoroughfares, and dedicated personnel to monitor employee movements during this period. Any recreational facilities (pool table, table tennis table etc.) will be out of use. <p>Hygiene/ Cleaning /PPE</p> <ul style="list-style-type: none"> 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. Have in place plans to provide personal protective equipment e.g. face masks, disposable gloves etc. if government guidelines indicate that this may be 			

Hazards	Risk rating L x C = R			Current Risk Controls	Additional Risk Controls	New Risk Rating L x C = R		
				<ul style="list-style-type: none"> • Hand-sanitisers provided on each desk. Tissues supplied on each desk. • Posters displaying government guidance on catch it, bin it. • Handwashing facilities with soap and water. • Posters displaying guidance on handwashing. 	<p>necessary. Provide training to employees on how to safely use PPE.</p> <ul style="list-style-type: none"> • Employees will be required to take their headsets, laptops and other equipment home at night to ensure a clear desk policy. • Equipment must not be shared e.g. pens etc. • Each workstation will be supplied with anti-bac wipes. • Additional enclosed bins will be supplied to dispose of anti-bac wipes. <p>Handwashing</p> <ul style="list-style-type: none"> • Provide additional hand sanitising stations and ensure that advisory posters relating to handwashing techniques are strategically placed around the premises. • Keep a reasonable stock of cleaning/sanitary products available e.g. soap, paper towels, tissues. • Employees will be required to take their headsets, laptops and other equipment home at night to ensure a clear desk policy. • Equipment must not be shared e.g. pens etc. • Each workstation will be supplied with anti-bac wipes. • Additional enclosed bins will be supplied to dispose of anti-bac wipes. • 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. • Doors and windows will be opened frequently to provide ventilation. • Ensure taps and showers are run before offices open to avoid any legionella contamination. 			

Hazards	Risk rating L x C = R			Current Risk Controls	Additional Risk Controls	New Risk Rating L x C = R		
				<ul style="list-style-type: none"> CT has a number of mental health first aiders available for employees to talk to. Company EAP scheme. A range of support material is available through the company E-learning platform 	<p>Training</p> <ul style="list-style-type: none"> Employees will be consulted on the risk assessment plans and will receive a personal brochure on what has been put in place. Train first aiders in how to safely support employees including paying attention to handwashing. Ensure taps and showers are run before offices open to avoid any legionella contamination. 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. Record any steps taken <p>Employee Well-being</p> <ul style="list-style-type: none"> Reminder on how to contact MHFA team. Employees will be reminded on the external support via the company EAP scheme and e-learning platform. Managers and HR will talk to employees to review effectiveness of these measures. Support employees using HSE stress management standards where work related issues present themselves https://www.hse.gov.uk/stress/standards/ <p>Monitoring</p> <ul style="list-style-type: none"> We will regularly review this risk assessment and update where necessary. We will listen to feedback from employees on suggestions and concerns and modify plans as needed. A monitoring record should be kept helping the company review procedures post pandemic. 			

Hazards	Risk rating			Current Risk Controls	Additional Risk Controls	New Risk Rating		
	L	x	C = R			L	x	C = R
Building Checks A complete check of the following systems already in place before employees are allowed back on site.	3	3	9	<ul style="list-style-type: none"> Regular inspections in place in all areas. 	Fire Safety Systems <ul style="list-style-type: none"> 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 lighting system across the site. A visual inspection of all fire extinguishers to ensure they are correctly located, full and not obviously damaged. A check of the fire exit routes to ensure they are clear of any obstructions. Check that the fire exit doors are not locked and are operational. Check that the internal doors operate properly. Check the automatic fire dampers, smoke venting and smoke extraction systems are operational. Water management To reduce the risk of Legionella bacteria due to water systems not being used for an extended period. <ul style="list-style-type: none"> The systems should be thoroughly cleaned, flushed and disinfected. Statutory Inspections <ul style="list-style-type: none"> 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. 	2	3	6

Assessors Name:		Date of Assessment:	
Approved By:		Date of Review:	