

## Covid-19 Risk Assessment

What are the risks?	Mitigation and controls in place	Severity	Likelihood	Inherent risk	Residual risk
<b>Colleague (or a third party who works in a James Hay office) has contracted, or believes they have, Covid-19.</b>	<ul style="list-style-type: none"> <li>All employees/contractors are required to comply with Government guidelines to stay home and self-isolate (for 10 days). Personal home circumstances will be considered, alongside advice provided by the NHS test and trace service.</li> <li>We're enabling employees to work remotely while self-isolating where appropriate, through the provision of suitable IT equipment (ie laptop, mobile phone and display screen equipment).</li> <li>We're ensuring employees are kept up to date with how our business is adapting operations in light of Covid-19, and the application of Government guidelines, through regular internal communications.</li> <li>Line Managers are applying our Absence Policy and working with HR to ensure our People HR system records are up to date.</li> <li>Line Managers are ensuring that employees displaying Covid-19 symptoms immediately stay home and self-isolate.</li> <li>Our Employee Forum has input on the measures we've taken to transition to remote working and to ensure all lockdown restrictions are being followed appropriately.</li> <li><b>To maintain service operations:</b> Where we require certain functions to maintain an office presence, teams are divided in two and we're operating with alternate sub-teams in the office (eg for a week at a time). This continuity plan will enable whole teams to isolate should a colleague begin to display Covid-19 symptoms.</li> </ul>	4	4	16	2
<b>Colleague (or a third party who works in a James Hay office) passes Covid-19 to others within the workplace.</b>	<ul style="list-style-type: none"> <li>All employees are required to comply with 2m social distancing guidelines within our workplaces.</li> <li>Only essential personnel required to maintain business operations are permitted at our offices.</li> <li>The Facilities team regularly complete reviews of the safety measures in place across all our locations; ensuring measures remain in line with Government guidelines.</li> <li>We seek feedback from employees to ensure measures remain effective.</li> <li>Line Managers are ensuring that employees displaying Covid-19 symptoms immediately stay home and self-isolate, and that People HR records are maintained appropriately.</li> <li>We're ensuring employees are kept up to date with how our business is adapting operations in light of Covid-19, and the application of Government guidelines, through regular internal communications.</li> <li>All third party contractors are required to comply with the safety measures/controls advised to them by the Facilities team.</li> </ul>	4	2	8	2
<b>Inappropriate treatment of vulnerable employees</b>	<ul style="list-style-type: none"> <li>All employees who are considered vulnerable individuals (i.e. with medical conditions or as defined by Government) are remaining at home, working remotely until lockdown restrictions are removed, in line with Government guidance.</li> <li>Employee communications signpost support and mental health and wellbeing resources to all employees.</li> <li>Line Managers are striving to support mental health and wellbeing for their teams.</li> </ul>	3	2	6	2

What are the risks?	Mitigation and controls in place	Severity	Likelihood	Inherent risk	Residual risk
Colleague anxiety regarding returning to the workplace.	<p><b>General</b> (applicable to all James Hay locations)</p> <ul style="list-style-type: none"> <li>James Hay complies with Government guidance for businesses and workplaces.</li> <li>All employees are required to follow 2m social distancing guidelines within our offices.</li> <li>We're providing regular employee communications to share updates to office safety protocols in line with 'Covid-19 Staying Secure' guidance.</li> <li>Line Managers are ensuring that employees displaying Covid-19 symptoms immediately stay home and self-isolate, and that People HR records are maintained appropriately.</li> <li>Line Managers are applying our Absence Policy and working with HR to ensure the People HR system records are up to date.</li> <li>If employees have concerns that they feel are not being addressed by their Line Manager, they can contact the Covid Working Group and/or Senior Management.</li> <li>The Facilities team complete regular reviews of the safety measures in place across our locations; ensuring measures remain in line with Government guidelines.</li> <li>Line Managers encourage their employees to check the Display Screen Equipment (DSE) requirements for employees within the workplace and follow the procedure.</li> <li>We regularly complete workplace risk assessments and display the 'Covid Secure' poster in all our locations.</li> <li>PPE/masks are to be worn by employees when moving within our buildings (e.g. from one side/block to another).</li> <li>All employees are to use digital tools (such as Microsoft Teams) to avoid face-to-face meetings.</li> </ul>	3	3	9	2
	<p><b>Dunn's House/Bristol - Castle Park</b></p> <ul style="list-style-type: none"> <li>We regularly review the maximum occupancy levels for each office, in line with social distancing guidelines.</li> <li>Employee travel is restricted between sites to business-critical meetings, but there must be a legitimate reason for not using digital conferencing tools (such as Microsoft Teams) instead.</li> <li>Social distancing measures are in place for high use areas such as corridors, common areas and break out areas.</li> <li>Floor markings and one-way systems have been introduced at all office entry and exit points, where possible and practical.</li> <li>Workstations are being assigned to individual employees and not shared. Only alternate desks are occupied to ensure social distancing is observed.</li> <li>Employees are also situated throughout the building to maximise social distancing.</li> <li>We issue regular employee communications to provide clear guidance on social distancing. We've also introduced new signage and visual aids to remind employees and put in place other safety measures across our offices.</li> <li>Hand sanitiser has been installed at entry/exit points.</li> <li>Additional sanitiser is provided in and around washrooms (these are regularly checked and refilled).</li> <li>Electrostatic treatment cleaning regularly takes place across all locations.</li> <li>Our cleaning regime has been altered to ensure all desks used during the day are cleaned each evening; employees are required to mark the desk with a flag to indicate it requires cleaning.</li> <li>Use of lifts is limited to one person at a time and restricted to the post room team and employees unable to use the stairs (ensuring those with physical disabilities are able to access the workplace).</li> <li>Use of meeting rooms is restricted to support social distancing.</li> <li>Employees are only to use larger meeting rooms if considered necessary. Smaller meeting rooms are only to be used for individual working.</li> <li>Break times are staggered to minimise crowding in common areas.</li> </ul>				

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<b>Building ventilation increases the risk of transmission</b>	<ul style="list-style-type: none"> <li>The Health &amp; Safety Executive (HSE) have advised that the risk of air conditioning spreading Covid-19 is extremely low. External experts have reviewed our ventilation systems to provide reassurance that we're operating in line with Government guidance.</li> <li>The ventilation system within Dunn's House does not recycle air from within the building, it pulls in external air and filters it into the building - reducing the risk of an airborne virus circulating within the building.</li> <li>The Facilities team regularly check the ventilation system settings to ensure they remain appropriate.</li> </ul>	4	2	8	2
<b>Building evacuations and emergency procedures may be compromised</b>	<ul style="list-style-type: none"> <li>Third party contractors and visitors to all sites are restricted to essential personnel required to maintain business operations e.g. cleaning team or engineers.</li> <li>We encourage use of digital conferencing tools (such as Microsoft Teams) and discourage meeting on site unless essential.</li> <li>Building maintenance schedules are in place for essential services to reduce interaction and overlap with employees.</li> </ul>	3	3	9	2
<b>Inappropriate treatment of vulnerable employees</b>	<ul style="list-style-type: none"> <li>We've appointed Fire Wardens from the team of employees currently working within our offices.</li> <li>Fire evacuation instructions are communicated through the office PA systems and reinforced through employee communications.</li> <li>Facilities support these Fire Wardens in executing their responsibilities.</li> <li>Personal Evacuation Plans will be agreed to assist employees returning to the workplace.</li> <li>Planned building evacuation drills have been deferred until later in 2021.</li> <li>In an emergency situation, employees are not expected to observe social distancing (as this could slow down evacuation and be dangerous).</li> </ul>	3	4	12	2
<b>Returning to 'multi-tenant' workplaces.</b>  <b>Brentwood Bristol London</b>	<ul style="list-style-type: none"> <li>Third party building owners/operators require all tenants to follow social distancing guidelines.</li> <li>The London office has been closed since March 2020.</li> <li>We regularly review the maximum occupancy levels for each location, in line with social distancing guidelines.</li> <li>Employee travel is restricted between sites to business-critical meetings, and there needs to be a legitimate reason for not using digital conferencing tools instead.</li> <li>Social distancing measures are in place for high use spaces such as corridors, common areas and break out areas.</li> <li>Employees are distributed throughout our buildings to ensure social distancing rules are observed.</li> <li>Hand sanitiser has been installed at entry/exit points.</li> <li>Electrostatic treatment cleaning regularly takes place across all locations.</li> <li>The use of meeting rooms is restricted to enable social distancing.</li> <li>Employees are only to use larger meeting rooms if considered necessary. Smaller meeting rooms are only be used for individual working.</li> <li>Break times are staggered to minimise crowding in common areas.</li> <li>Regular employee communications provide guidance about remaining 'Covid-19 safe' in the workplace. These include emails, intranet articles and the display of posters around our offices.</li> </ul>	3	4	12	3

# Impact matrix

	Financial	Customers	Regulatory	Conduct	Reputational	Internal
<b>Severe</b>	Executive risk: > £2m	Substantially all customers impacted and or disadvantaged - e.g. complete loss of new business, loss of major adviser/ intermediary contracts, measurable loss of over 50% of customer base, individual customers/members.	Severe regulatory sanctions imposed up to withdrawal of authority by the FCA.	Total loss of control of employee conduct leading to a severe and immediate reduction in revenue.	Fundamental impact to the firm's reputation. Highly negative news story/ies about JHP spreading via multiple media sources.	Majority of operations/ functions and/or support functions completely disabled.  c75% or more of employees.
	Departmental risk: > £0.5m					
<b>Major</b>	Executive risk: > £0.5m to £2m	Customer dissatisfaction Measurable level of customer loss; Loss of key/high value account or loss of multiple small/medium accounts. Measurable reduction in levels of new business; Loss of service for over 1 day.	Breaches leading to regulatory sanction/ censure.	Systematic mis-conduct issues with measurable level of deliberateness;  Multiple negligent or deliberate events leading to multiple customer loss.	High level of negative publicity and damage to firm.	Multi-departmental disruption; Critical backlog created - clearance may not be viable; requiring escalation to board.  c75% or more of employees.
	Departmental risk: > £100k to £0.5M					
<b>Significant</b>	Executive risk: > £100k to £0.5m	Impact ranging from minor inconvenience to individual/ small number of customers, to measurable customer dissatisfaction including complaints; Loss of service for up to 1 day.	Impacts ranging from minor compliance breaches to reportable breaches attracting regulatory attention.	Multiple material conduct issues, or single conduct issue involving significant customer detriment.	Impacts ranging from some negative publicity and loss of reputation to the firm, to significant level of critical comments and/ or complaints from key adviser firms and/ or large numbers of customers.	Significant inconvenience at team/department level; Departmental disruption - multiple days; At least next day /multi-day backlog created; possibly requiring escalation to ExCo.
	Departmental risk: > £10k to £100k					
<b>Minor</b>	Executive risk: > £0 to £100k	No material impact.	No material breach; possible indication of trend towards non-compliant behaviour.	No conduct issue.  Less than 500 customers materially impacted.	No material impact.	Minor inconvenience; Lost/corrupt work capable of restoration by way of process repetition - no next-day backlog.
	Departmental risk: > £0k to £10k					

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