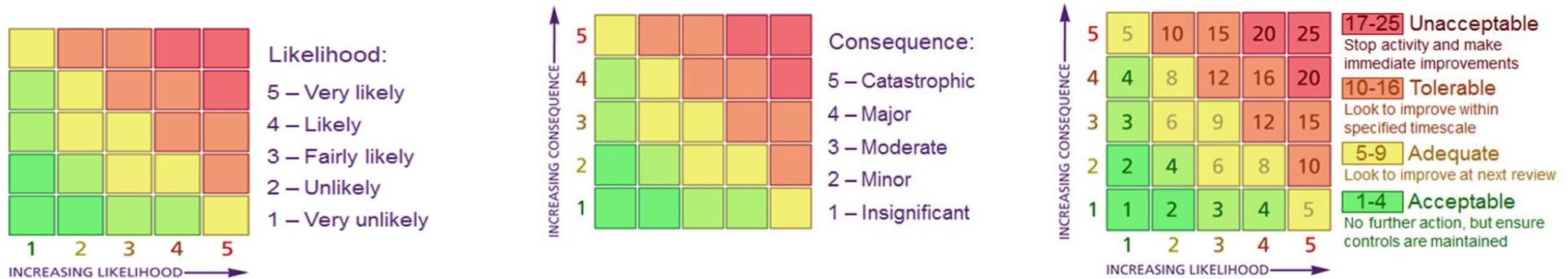


Person affected

- | |
|--------------------------|
| 1) Employees |
| 2) Sub-contractors |
| 3) Members of the public |

Task Details: Front line Debt Collection and Investigations via visits to residential and business premises



Required Action Table							
1 to 4	Minimised	5 to 8	Acceptable	9 to 15	Improvement	16 to 25	STOP IMMEDIATELY
No further action monitor and review.		Consideration should be given as to whether the risks can be lowered, but the costs of additional risk reduction measures should be taken into account. The risk reduction measures should be implemented within a defined time period.		Significant efforts should be made to reduce the risk. Risk reduction measures should be implemented urgently within a defined time period and it might be necessary to consider suspending or restricting the activity, or to apply interim risk control measures, until this has been completed. Considerable resources might have to be allocated to additional control measures.		STOP, significant improvements in risk control are necessary, so that risk is reduced to a tolerable or acceptable level. Do not proceed until additional risk controls are implemented.	

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

Owner: J Mason
Issue No: 1
Date Prepared: August 2020
Review Date: Daily
Approved by: N Walters
Page 2 of 15

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Enforcement Agents undertake work with COVID-19 Symptoms.</p> <p>Risk to individual health and others, cross contamination and spread of the virus.</p>	3	4	12	<p>Training and Guidance video was developed by CDER Group and shared with and used by CIVEA. All Enforcement Agents have been required to undertake detailed COVID-19 training prior to recommencement of duties. Documentation and training detailing the symptoms of COVID-19 and the actions to take (self-isolation) for all enforcement agents included throughout.</p> <p>A self-declaration procedure has been implemented whereby Enforcement Agents must send a message on our case management system, Edge every morning has been implemented to confirm that they are symptom free.</p> <p>Regular communication with all enforcement agents providing the latest updates from Public Health England and the NHS.</p> <p>Face covering and other PPE to reduce the possible risk of an enforcement agent unknowingly spreading the virus (see PPE section below).</p>	1	4	4	<p>Enforcement Support teams on duty during all hours when Agents are in field providing telephone support if needed.</p> <p>CDER's dedicated Audit team has implemented additional audits checks for adherence to COVID guidance and requirements. All Auditors have been instructed to flag any noticeable issues with EA health observed through Body Worn Video.</p>	<p>Lee Brown – COMPLETE</p> <p>Neil Walters - ONGOING</p>

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Risk of exposure to COVID-19 whilst using public transport.</p> <p>Risk of cross contamination using shared vehicles.</p> <p>Risk of contaminating or expose from frequently touches areas such as keys, steering wheel, gear sticks, indicators, controls, and door handles.</p>	3	4	12	<p>Enforcement agents have been provided with safe travel guidance.</p> <p>Risk is minimal as public transport is not used as part of field operations. However, Enforcement Agents have been advised to avoid public transport outside of working hours.</p> <p>Enforcement agents are required to travel alone during visits. Where this is not possible:</p> <ul style="list-style-type: none"> ▪ Where travelling alone is not possible journeys are to be shared with the same individuals and with the minimum number of people at one time, ensuring occupants wear face coverings and provide good ventilation in the vehicle (windows open). ▪ Vehicles to be cleaned extensively using gloves and standard cleaning products, with particular emphasis on handles and other areas their passengers may touch surfaces. ▪ Hand sanitiser is recommended for all passengers prior to entry. <p>Enforcement agents are required to wear gloves when refuelling, and hand sanitiser has been provided which must be used frequently throughout the day.</p>	1	4	4	<p>Additional MOJ guidance issued on 21 August has been shared with EAs.</p> <p>Review of additional PPE that may be required to be provided to Arrest Officers that are due to work in pairs from September to further mitigate risk</p>	<p>Lee Brown - COMPLETE</p> <p>Paul Caddy – September 2020</p>

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

Owner: J Mason
Issue No: 1
Date Prepared: August 2020
Review Date: Daily
Approved by: N Walters
Page 4 of 15

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>There is high probability that Enforcement Agents will encounter customers adversely impacted by COVID19</p> <p>Increased financial difficulty and hardship</p> <p>Additional adverse impact on customers health and well being</p>	5	4	20	<p>Existing training already includes extensive modules on following the guidance on vulnerability set out in the National Standards for Taking Control of Goods All EAs have undertaken refresher training to ensure they act in accordance with all relevant legislation.</p> <p>All documentation, website etc. provides clear signposting of debt advice services.</p> <p>Pre visit activity, where permitted by clients, has attempted to encourage contact from customers. Alternative wording to all outbound communications has been adopted with COVID19 specific wording and highlighting willingness to assist the customers in managing their debt issues</p> <p>CDER Group have developed a Fairness Framework that focuses on dealing with vulnerable customers. An enlarged and dedicated welfare team has been established for such cases to be dealt with outside of the standard collection process</p> <p>Our CRM system Edge has been configured to enable accurate and consistent recording of customers potential vulnerability scenarios. Cases have been placed on hold to provide breathing space and longer payment arrangement terms agreed</p> <p>Longer payment arrangement periods implemented</p> <p>Where vulnerability confirmed, Edge system has</p>	3	4	12	<p>Additional SMS and emails to be sent 24 August to advise customers visits have recommenced and to contact us urgently if displaying symptoms / shielding</p> <p>All Notices of Enforcement and reminder letters to be amended to include reference to shielding / symptoms</p> <p>Additional MOJ guidance issued on 21 August shared with all EAS with additional guidance and from Chief Operating Officer</p> <p>Key priority of dedicated Audit Team is to review Body Worn Video of EA visits and ensure absolute compliance when dealing with potentially vulnerable customers. Any failure classified as a Major Fail and EA subject to suspension of visit activity, retraining or removal from service</p>	<p>Craig Alewood – 24 August</p> <p>Craig Alewood – 28 August</p> <p>Lee Brown – COMPLETE</p> <p>Neil Walters – ONGOING</p>

				been configured to remove £235 visit fee and escalate to client if necessary			
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Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
Exposure to COVID-19 when attending a debtor's property. Risk to enforcement agents and others. Poor hygiene Contact with others Use of lifts, handrails, and frequently touched areas.	3	4	12	Enforcement agents prompted to and are required to check case notes prior to leaving their vehicle to confirm that the contact centre (as part of COVID 19 outbound communications and internal intelligence gathering) has not updated the customer file since last reviewed to suggest someone at the property has or is suspected to have COVID-19. Edge system has been configured to enable specific COVID, Shielding and Key Worker classification. Over 7000 items of PPE equipment have been sourced and provided to EAs along with supporting video training and guidance. Any new EA joining CDER Group will not be permitted into the field until they have completed the CIVEA approved training and been issued with appropriate PPE. Personal hygiene controls introduced. Enforcement Agents must use alcohol-based hand sanitiser before exiting their vehicles, and ensure all equipment is cleared with antibacterial wipes. Social distancing measures implemented. All Enforcement Agents must carry out a dynamic risk	1	4	4	Over 116,000 reconnection communications have been issued providing customers with advance notice of possible visit if contact / payment is not made All correspondence has been amended to specifically reference COVID 19 and need for customers to make contact to avoid visit All open cases have received at least two outbound calls and/or SMS or emails where a telephone number or email for the customer has been sourced Additional shielding / COVID specific SMS and email will be sent on Monday 24 August with cases being placed on hold where appropriate	Craig Alewood – COMPLETE (for all existing cases) and ONGOING for new cases or those still on hold due to client instruction Lee Brown – ONGOING

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

			<p>assessment at the start of each visit and adhere to social distancing requirements (2m distance from others reducing to 1m+ with appropriate PPE).</p> <p>Enforcement Agents provided with specific COVI19 training and guidance on safe working practices, including how to safely knock of the door, the use of lifts and contact with frequently touched areas.</p> <p>Intelligence gathering by Enforcement Agents is required to confirmation that social distancing will be maintained by the debtor and others.</p>			<p>All visits for at least the first 30 days will be non-contact and EAs will not enter residential premises</p> <p>All visits to business premises will follow that specific businesses requirements for entry / movement around the property</p> <p>Any contact from customers citing shielding or self-isolation / COVID related symptoms have been placed on hold to prevent visit. For shielding, 7 days to allow provision of evidence, for COVID symptoms, 14 days to reflect isolation period</p> <p>Review of additional PPE in the form of 'Face Visors' to be provided to Arrest Officers that are due to work from September</p>	<p>Lee Brown – ONGOING</p> <p>Lee Brown – ONGOING</p> <p>Paul Caddy – September 2020</p>
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CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

Owner: J Mason
Issue No: 1
Date Prepared: August 2020
Review Date: Daily
Approved by: N Walters
Page 7 of 15

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when taking payment.</p> <p>Risk to enforcement agents and others.</p> <p>Shared equipment (payment devices)</p> <p>Possible risk of cross contamination from the user of paper (letters, receipts)</p>	2	4	8	<p>Cash payments are not permitted under any circumstances</p> <p>Enforcement agents must remain 2m away from the debtor and others at all times reducing to 1m+ with appropriate PPE.</p> <p>PPE equipment must be worn and adhering to safe working practices provided.</p> <p>Contactless payments will be taken by “Paylinks”. The customer will receive a custom URL using email or SMS which will have all the details pre-filled. The customer can add their card details to make the payment securely.</p> <p>Receipts will be issued by email only. No paperwork to be issued.</p>	1	4	4	<p>Risk has been reduced further due to pre visit communications to all outstanding customers advising to contact, pay or advise of shielding / COVID symptoms have been issued with additional SMS / Email to all open cases due a visit on 24 August</p> <p>Amended payment arrangement policies introduced to provide customers with longer periods for repayment</p> <p>CDER’s dedicated Audit team has implemented additional audits checks for adherence to COVID guidance and requirements. Using Body Worn Video Auditors will identify any failures of EAs to wear PPE or not maintaining Social Distancing etc. Any failures will be escalated, and retraining undertaken before being allowed back in the field.</p>	<p>Lee Brown – 21 August 2020</p> <p>Neil Walters - ONGOING</p>

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when communicating and recording evidence.</p> <p>Increased risk of transmission due to raised voices.</p> <p>Risk to enforcement agents and others.</p>	2	4	8	<p>Existing training modules cover the need for calm and effective management of verbal communication with customers.</p> <p>All EAs issued with Body Worn Video</p> <p>The enforcement agent is required to ask the resident/customer to take pictures of relevant evidence and send via email to CDER Customer Care.</p> <p>If the customer does not have the ability to do this, the Enforcement Agent is required to ask the customer to place the evidence on doorstep and then to step back the enforcement agent can take a picture.</p> <p>PPE and safe working practices guidance has been issued.</p>	1	4	4	<p>Additional MOJ COVID 19 guidance issued to all EA with regards to risks of raised voices.</p> <p>EAs specifically advised to avoid engaging in situations where voices could be raised and to retreat from premises if customer is becoming angry, loud or volatile.</p> <p>All EAs specifically advised to withdraw from premises where customer claims COVID19 symptoms</p> <p>All EAs specifically advised and have received additional welfare and vulnerability training</p> <p>Dedicated Audit team will monitor all EAs conformance and handling of communication with customers and identify any failures for escalation to Enforcement Operations.</p>	<p>Lee Brown – COMPLETE</p> <p>Lee Brown – COMPLETE</p> <p>Lee Brown – COMPLETE</p> <p>Carole Kenney – COMPLETE</p> <p>Neil Walters - ONGOING</p>

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

Owner: J Mason
Issue No: 1
Date Prepared: August 2020
Review Date: Daily
Approved by: N Walters
Page 9 of 15

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 when clamping a vehicle</p> <p>Risk to enforcement agents and others.</p> <p>Risk of possible interference when fitting the clamp.</p>	1	4	4	<p>Enforcement agents are required to apply hand sanitiser prior to applying gloves.</p> <p>A face shield must be worn and adhering to JBW safe methods of working for clamping vehicles adhered to.</p> <p>Whilst fitting the clamp the enforcement agent must maintain a 2m distance from others, if not able to do so they must withdraw safely in accordance with guidance.</p> <p>Once fitted the Enforcement Agent must clean the clamp with disinfectant spray to minimise possible risk to others.</p> <p>When removing a clamp, the enforcement agent puts on PPE, adheres to social distancing and disinfects the clamp before returning it to their vehicle for storage.</p>	1	4	4	<p>Outbound letters, calls, SMS and emails throughout the period leading up to restart have minimised the number of cases where clamping of a vehicle might take place.</p> <p>Dedicated Audit team will monitor EA Body Worn Video to identify any instances of non-conformance and will raise any failures with Enforcement Support</p>	Neil Walters - ONGOING

			R				R		Date
<p>Exposure to COVID-19 to the enforcement agent when returning to their vehicle and preparing for the next visit.</p> <p>Possible risk of cross-contamination.</p> <p>Possible risk of incorrect PPE storage.</p>	2	4	8	<p>Enforcement Agents have been issued with safe working practices guidance and are required to maintain social distancing when returning to their vehicle</p> <p>All enforcement agents must remove PPE prior to re-entering their vehicle in accordance with safe removal and disposal guidance.</p> <p>Hand sanitiser must be re-applied before entering the vehicle.</p> <p>Reusable PPE must be stored correctly. Gloves and face masks to be disposed of, face shields/visor to be cleaned and returned to storage sleeve.</p> <p>All equipment must be re-cleaned with antibacterial wipes.</p> <p>Any incidents of additional intelligence gathered (i.e. debtor or family member is in self-isolation) must be reported.</p>	1	4	4	<p>Monitor and review</p> <p>Dedicated Audit team will monitor EA Body Worn Video to identify any instances of non-conformance and will raise any failures with Enforcement Support</p>	<p>Helen Roberts</p> <p>Neil Walters - ONGOING</p>

			R				R		
<p>Exposure to COVID-19 when entering a customer’s premises.</p> <p>Risk to Enforcement Agents and others.</p>	3	4	12	<p>CIVEA agreed restart policy is not to enter residential premises for the 1st 30 days (earliest 24 September)</p> <p>COVID 19 specific training has provided all EAs clear guidance on the risks and how to manage them</p> <p>Enforcement agents must</p> <ul style="list-style-type: none"> ▪ Adhere to social distancing requirements 1m+ with appropriate PPE. ▪ All visits to business premises will follow that specific businesses requirements for entry / movement around the property ▪ Wipe vehicle frequently touched internal areas and handles with antibacterial wipes ▪ Clean work boot with antibacterial spray/wipes and leave in vehicle ▪ Apply alcohol-based hand sanitiser before entering their home ▪ Remove clothing and wash straight away on 60-degree wash ▪ Wash hands, arms, and face immediately before coming into contact with others. <p>All enforcement agents are advised not to return to work the next day if they have developed symptoms of the virus and to follow the self-isolation guidance.</p>	1	4	4	<p>Pre visit communication activity has ensured every customer due to be visited has had at least one item of written postal correspondence. Where telephone numbers and emails have been sourced, at least two further items of outbound communication advising of the restart of enforcement visits and the need to contact us if anyone has symptoms, is self-isolating or has been advised to shield.</p> <p>Further MOJ guidance on undertaking visits at residential premises has been shared with all Enforcement Agents and all Enforcement Agents have been instructed to withdraw from premises in this scenario.</p> <p>Dedicated Audit team will monitor EA Body Worn Video to identify any instances of non-conformance and will raise any failures with Enforcement Support</p>	<p>Craig Alewood - COMPLETED</p> <p>Lee Brown – COMPLETE</p> <p>Neil Walters - ONGOING</p>
Hazards	L	C		Controls in Place	L	C		Additional Controls	Owner - Date

			R				R		
Potential adverse impact on mental health of the Enforcement Agent working in extraordinary and difficult times due to COVID-19 and its impact.	2	3	6	Support system is in place by Human Resources. Regular contact with managers to discuss any areas of concern or opportunities for improvements. Referrals to mental health charities and support.	2	2	4	Monitor and review	Helen Roberts - ONGOING

Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
Exposure to COVID-19 (General) Personal Protective Equipment (PPE) Social Distancing Poor Hygiene	4	4	16	Enforcement agents have been issued with guidance on the safe use of PPE, including the correct donning and doffing process in order to minimise the risk of self-contamination. This is to be used in addition to safe working practices and is to protect themselves and others. All enforcement agents have been supplied with: <ul style="list-style-type: none"> ▪ Hand Sanitiser (Alcohol Based Min 70%) ▪ Nitrile Gloves - Recommended EN 374-5 certified; nitrile material offers tear resistance, strength and longevity; easy to throw away ▪ Face Coverings Enforcement agents will be reminded of the	1	4	4	Face mask – FFP2 – user choice Face Shield/Visor – user choice Monitor and review Review of additional PPE issued to Arrest Officers to further mitigate risk – FFP3 Masks for drivers in Pairs and Face Shield/Visor/Goggles	Helen Roberts - CLOSED Paul Caddy – September 2020

			<p>importance of social distancing both in the workplace and outside of it.</p> <p>All enforcement agents must remain a 2m distance from others, wherever possible, 1m+ with appropriate PPE.</p> <p>Face to face communication will be minimised where possible, communication will be carried out by text, phone call, and email.</p> <p>Avoidance of populated areas, enforcement agents should not visit local shops (i.e. to purchase lunch) during operational hours.</p> <p>Enforcement agents must check for regular guidance on office website such as gov.uk and the NHS.</p> <p>Enforcement agents must:</p> <ul style="list-style-type: none"> ▪ Wash hands on a regular basis for 20 seconds with warm water and soap or use hand sanitiser provided. Avoid touching face at all times. ▪ Hands must be sanitised upon arrival at the customers premises prior to leaving the vehicle and before re-entering the vehicle. ▪ Follow Catch It, Bin It, Kill It guidance to catch coughs and sneezes. ▪ Frequently clean work equipment and 					
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				<p>shared equipment, to be disinfected before and after use (where possible).</p> <ul style="list-style-type: none"> ▪ Public facilities wiped down before use i.e. toilet handles and taps. 				
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Hazards	L	C	R	Controls in Place	L	C	R	Additional Controls	Owner - Date
<p>Exposure to COVID-19 (Specific High-Level Risks)</p> <p>Risk of an enforcement agent being deliberately exposed due to being spat or coughed at by someone threatening to have the virus.</p> <p>Confirmed case of COVID-19 of an enforcement agent</p>	3	4	12	<p>Guidance has been provided on how to withdraw safely from a visit and how to minimise the risk of exposure through additional safety controls.</p> <p>An incident reporting system (Edge) is in place for all enforcement agents to report an incident.</p> <p>Case notes are updated to make others aware of the risk.</p> <p>PPE equipment (listed above) to protect the enforcement agents with direct contact.</p> <p>Enforcement agents are advised to report any symptoms of the virus and any conformed cases.</p> <p>A full investigation will be carried out into possible exposure during working operations. The risks will be addressed. Reported to RIDDOR if required.</p>	2	4	8	<p>Support to manage the potential impact of such risk on an Enforcement Agents mental health.</p> <p>Dedicated Audit team will monitor EA Body Worn Video to identify any instances arising and will raise with Enforcement Support to ensure reported</p>	<p>Helen Roberts (21/05/2020)</p> <p>Neil Walters - ONGOING</p>

CDER Group: COVID-19 Safer Working Practices – Enforcement Agents and Field Operations

			<p>Full clean down of working areas (vehicles) and equipment.</p> <p>On-going support for the enforcement agent from Human Resources.</p>					
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