



COVID-19

# Return-to-Workplace Guide



Financial Institutions



**Gallagher**

Insurance | Risk Management | Consulting

Gallagher's expertise can help your:

**PEOPLE** by supporting the health, safety and wellbeing of your workforce

**PROPERTY** by monitoring and mitigating potential virus rebounds or outbreaks

**FINANCIAL STABILITY** by reducing your risk and supporting your revenue streams

As states and other government authorities lift the restrictions imposed as a result of the COVID-19 pandemic, businesses are starting to prepare for reopening. The decision to reopen is a complex issue. We cannot advise you whether you should or should not reopen your business. If you decide to do so, we have generated this information for your review and consideration. It includes some high-level ideas that you may want to consider as you move through the process, and may not take into account all of the unique and specific issues that may be involved in opening your business. If you have questions about this information or your insurance coverages, please contact your Gallagher representative.

Financial institutions are largely considered critical infrastructure and have continued to operate in some capacity throughout the pandemic. While still functioning, they have been affected by remote working, social and workplace distancing, increased sanitation, workforce illnesses, increased regulations and protocols to protect employees and customers, and more.

In this guide, we will take a look at steps you can take and the tools Gallagher can provide as your organization continues to operate and restrictions begin to lift.

### Five-Step Process to Returning to the Workplace



# FIVE-STEP PROCESS TO RETURNING TO THE WORKPLACE

STEP  
1

## CONTINUING ESSENTIAL OPERATIONS

- Gallagher Forecast: Real-time COVID-19 geographic case monitoring and tracking
- Federal/local government
- Case data
- Gallagher Peak Infection Analysis

STEP  
2

## EMPLOYEES: IMPLEMENTATION OF POLICIES AND PROCEDURES BY ROLE AND FUNCTION

- Infection prevention measures
- Social distancing and hygiene
- Personal protective equipment (PPE)
- Proactive claims management
- Employee assistance programs (EAPs)
- Compensation and benefits modifications
- HR policy considerations

STEP  
3

## FACILITIES AND EQUIPMENT: SANITIZATION, LIFE SAFETY, BUILDING SYSTEMS AND SOCIAL DISTANCING

- Cleaning and decontamination
- Industrial hygiene and engineering
- Protection and response

STEP  
4

## OPERATIONS SUPPLY CHAIN AND THIRD-PARTY SERVICES

- Product, services and partners
- Distribution/transportation/deliveries
- Business continuity planning

STEP  
5

## CUSTOMER, CLIENT AND PUBLIC RELATIONSHIPS

- Contact points
- Communications consulting
- Waivers and notices
- Claims-reporting support

# KEY QUESTIONS TO CONSIDER

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Gallagher has gathered a library of questions for employers to consider when determining a return-to-workplace plan.

## Your Workplace

- What federal, state, or local guidelines and regulations apply to our organization, our people and our business invitees?
  - Are we prepared and able to comply with all federal, state and local return-to-workplace guidelines?
  - Have we developed a site-level weekly work schedule that will allow us to meet our clients' needs, while also ensuring our employees' safety and our compliance with relevant guidelines and regulations?
  - Do we have a risk management process in place to cover worker reentry and account for new risks?
  - Have we defined customer and visitor contact protocols by site?
  - Have we identified which employees are most critical to return to a physical site and which employees can continue to work remotely?
  - How are we treating remote work moving forward?
    - » Staggering weeks in office and at home among team members, or part-time remote work on alternate weekdays
    - » Responding to employee requests to continue to work from home, including long-term arrangements
    - » Updating technology to support virtual workers
    - » Providing additional office equipment for remote workers
    - » Considering the long-term cost savings or impact of offering permanent remote work
  - Assuming more employees will be working remotely, how will we manage and deliver the same opportunities and benefits to our remote workers as compared to those working on-site?
  - For employees returning to a physical site, will we need to provide them with safe alternatives to local public transportation options?
  - Can we develop and maintain return-to-workplace schedules at the employee level by site?
  - How do we account for any child care issues that our employees may have, especially given that almost all school districts remain closed?
  - Have we established an incident management team, tools and processes to ensure that we are ready to begin operations?
  - Have we considered how new processes and risk controls will be monitored for operating effectiveness?
  - Have we considered what steps we should take to implement temperature checks?
  - Can we use contact tracing for employees and visitors to help reduce the risk of spreading COVID-19?
  - Should we introduce sanitization protocols, and more frequent and stringent cleaning protocols at each of our sites?
- Do we need to change our policies to encourage employees to clean their workspaces, wash their hands and promote our new safety protocols?
  - Will we require our employees and visitors to wear PPE such as masks when they are on-site? If yes, can we acquire enough PPE?
  - Do we have guidelines for physical distancing for our employees while they are at work?
  - Do we need to retain healthcare professionals or third-party vendors to implement our mitigation strategy, such as screening and/or temperature taking?
  - Do we have a targeted notification plan for notifying individuals at risk of exposure?
  - Do we have a policy on immunity or disease testing?
  - Have we developed a policy regarding business and personal travel for our employees?
  - Do we have a policy or set protocols implemented for customers and visitors who come to our sites?
  - Do we have a contingency plan in place if there is a significant spike in COVID-19 cases during the return transition period?

## Your People

- Is our leadership prepared and trained to lead a people-first way of working through this transition?
- Can our crisis management team transition to become our return-to-workplace team?
- What cultural strengths should we leverage as a focus point?
- Do we need to institute policies and programs to protect employees that have an underlying condition and are returning to a physical site?
- How do we help employees feel safe and comfortable as they return to their workplaces?
- How will we respond if an employee does not feel safe coming back to a physical work site, even though that employee cannot work remotely?
- How do reductions in hours of service, furloughs or layoffs impact employee status for purposes of the ACA?
- Do we have a plan to address the mental and emotional health of our employees?
- What policies or programs can we introduce to help our employees manage their stress levels as they begin to come back to the workplace?
- What new benefits should we offer to promote the health and wellbeing of our employees?

No matter where your organization stands in the COVID-19 pandemic, Gallagher has the insurance, risk management and consulting resources to help protect your people, your property and your profits.

Call your Gallagher consultant today to get the conversation started.

### Your Communications

- What training on new workplace safety and disinfection protocols has been implemented?
- Do we have exposure-response communications ready to go to any affected employees and customers?
- Have we considered what policy updates should be circulated to employees?
- What benefit changes do we need to communicate to employees?
- Do we have media communications ready to release on topics such as return-to-workplace timetables, safety protections in place, and how our organization is supporting workers and customers? Are we prepared to respond to the media regarding workplace exposures?

### Your Processes

- Have we coordinated an efficient business continuity plan that includes infectious disease control?
- Do we have the information necessary to facilitate efficient, data-driven decisions?
- Have we updated plan resources and contact information to ensure accuracy?
- What employee benefits deadlines have been impacted by disaster relief?
- Do we have a robust change management approach that can drive awareness during these difficult times, and that can support our culture and organizational objectives?
- What is our plan for training on new processes, policies and operational procedures?
- How will we define and measure a successful transition?
- What health verification solutions are best to ensure the privacy of our employees and the implementation of our organization's policies?
- How will we continue to adhere to our financial and corporate responsibility reporting, as well as all related disclosure requirements?

STEP  
**1**

**GOAL:** Monitor and assess the legal obligations your organization may face when reopening, and help guide decision-making based on state, local and federal government directives.

## CONTINUING ESSENTIAL OPERATIONS

Essential operations should continue to follow guidelines set forth by the Centers for Disease Control, the Occupation Safety and Health Administration, and state and local authorities. Guidance from these agencies continues to evolve as conditions change. It is important to note that as states loosen restrictions on business operations, the threat of the virus is not diminished. Employers must remain vigilant and use all guidance as the minimum standard that may be enhanced to meet the hazards presented in their workplaces.

The workforce is a microcosm of the surrounding community, so monitoring infection rates will help employers sense the health of their workforce. Companies with multiple locations in different jurisdictions should monitor changing conditions and requirements in each of their operational areas. Gallagher has a number of useful tools to monitor infection rates. These include:

Tool	How can it help?	How can we get started?
<b>Gallagher Peak Infection Analysis</b>	This tool illustrates a reasonable target date range for returning to the workplace by taking into account an organization's location or locations, the elapsed time since peak infection rates at those locations, and the prevailing shelter-in-place and stay-at-home orders in each state. It is especially impactful for organizations with geographically dispersed populations.	Contact your Gallagher representative for more information.
<b>Gallagher Forecast</b>	A real-time analytics platform that can help monitor confirmed cases of COVID-19 near critical locations and track growth rates of new cases globally to see where the curve is steepening or flattening.	Contact your Gallagher representative for more information.

STEP  
2

**GOAL:** Develop a plan that dictates clear, realistic and meaningful guidance of site-specific protocols and procedures that protect your employees. Make sure you have a plan and structure in place to communicate these processes and policies with employees, and share new information as local, state and federal guidance evolves.

## EMPLOYEES: IMPLEMENTATION OF POLICIES AND PROCEDURES BY ROLE AND FUNCTION

Employees are a critical part of your organizational success. Keeping them safe and ensuring their wellbeing is key as we move into the recovery phase. While performing the following steps, particular attention should be focused on employee safety and health.

### Workplace Controls for Preventing Employee Exposure

In addition to basic infection prevention measures such as frequent hand-washing, promoting respiratory etiquette, maintaining good housekeeping and discouraging the sharing of equipment, employers should review the following hierarchy of controls to select methods of controlling workplace hazards, such as COVID-19 exposure.

IMPLEMENT WORKPLACE CONTROLS USING THE HIERARCHY OF CONTROLS (OSHA, 2020)	
Consider engineering controls, such as physical barriers, increased ventilation and altering job tasks to reduce exposure.	Establish safe work practices that promote infection control such as additional signage and hands-free or no-touch operation of devices (faucets, trash cans, soap or sanitizer dispensers).
Establish administrative controls, such as alternating work schedules and replacing nonessential travel with virtual communications.	Complete job hazard analysis (JHA) for any roles that may have changed ( <a href="#">OSHA, 2020</a> ).
Consider OSHA regulations that may apply for written certification of workplace hazard assessment under the PPE standards ( <a href="#">OSHA, 2020</a> ).	Provide PPE to workers with the potential to be exposed as part of their normal assigned job duties. Consider making PPE available to employees who may come in close contact with customers, vendors or the general public ( <a href="#">OSHA, 2020</a> ).

For more detailed information on workplace controls and exposure risk classification, see [Guidance on Preparing Workplaces for COVID-19](#).

## STEP 2

### Employee Health Screening and Communication

Assess and determine if pre-shift employee health screenings, such as temperature monitoring, will be utilized. The CDC recommends that a person's temperature be below 100.4 degrees Fahrenheit. Develop a protocol for screenings to outline:

- Designated persons to conduct screening at the facility entry
- Training and PPE guidelines for screeners
- Documentation requirements and procedures
- Restricted points of entry to prevent employees from avoiding screening
- Education and training for employees on developed screening protocols

A sample policy, process, daily employee health screening log and visitor health screening form are included in the appendix.

Stay informed and updated on federal, state and local changes, and make revisions to your pandemic response as needed.

### Distancing Workers

Workers should practice self-distancing from each other as much as possible. Work areas should be arranged at a minimum of six feet apart to limit exposure to others.

### Face Coverings

The CDC recommends that everyone wear a face covering in public settings where other social distancing measures are difficult to maintain. Cloth face coverings and masks may slow the spread of COVID-19 by adding an extra layer of protection to prevent respiratory droplets from traveling in the air.

Cloth face masks are face coverings; they are not medical-grade masks or respirators. Face coverings are not considered PPE, but they are used to limit the potential spread of the virus and should be used when it is not possible or practical to maintain workplace distancing. PPE such as NIOSH-approved N95 masks and surgical masks should be reserved for medical workers, unless required for specific workplace protections covered under a respiratory protection program. Face coverings should cover the mouth and nose, but should not interfere with vision or required PPE. Face coverings may also induce heat illness. Employees should have multiple face masks so that they can keep them laundered. They may also need to change them out during the day, especially in humid and dusty environments or when in direct contact with customers.

### Engineering Controls

Engineering controls such as barriers, sneeze guards and ventilation systems can be effective in limiting the transmission of viruses. Engineering controls should be the first line of defense and can be especially helpful when physical distancing of workers cannot be effectively implemented.



# STEP 2

## Administrative Controls

Administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard. They require action by the worker or employer and may include:

- Encouraging sick workers to stay home
- Replacing face-to-face meetings with virtual communications or telework
- Establishing alternating days or adding extra shifts to limit the number of workers at the facility
- Developing emergency communications plans
- Training workers who need to use protective clothing and equipment

## Employee Training

Employee training should include preventative measures, both at home and in the workplace. Topics should include employee hygiene, symptoms monitoring, how to stop the spread, facility screening processes and requirements, and protocols for in-person service. Employees should be trained to wash or sanitize their hands after handling money or paper after each transaction with a customer. All training provided to employees should be documented.

## Employee Hygiene

For the safety and health of your employees, you should institute and communicate all mandated employee hygiene procedures. These should include:

- Communicating and posting signs regarding proper hand hygiene, and sneezing and coughing etiquette
- Providing single-use items such as tissues, paper towels and hand wipes
- Installing hand-sanitizing stations throughout the work area
- Keeping restroom facilities well stocked with soap and paper towels

## Employee Protocols for In-Person Service

If your business is just now opening for in-person service, employees should always wear a face mask or covering and maintain social distancing. Discourage handshakes and personal contact.

## Transportation On and Off the Job

Whenever possible, company vehicles and equipment should be assigned to just one operator to limit exposures. The equipment and or vehicles should be disinfected at the end of each shift or between users. If the vehicle is used to transport passengers, each should wear a face covering and use hand sanitizer when entering and leaving the vehicle. The vehicle should be disinfected following each trip.

Employees should be encouraged to limit ride-sharing, and use proper cleaning and disinfection following each trip. Once home, they should remove clothing/footwear. Consider washing work clothes separate from family laundry.



## STEP 2

### Contact Tracing

A formal contact-tracing procedure should be put in place incorporating the early engagement of suspected infected employees; identification; notification; and follow-up, monitoring and support of infected employees. Gallagher Bassett has a dedicated employer contact-tracing solution to ensure that your workforce and your organization remain safe during and after the reoccupancy phase of your business. A link to more information on this service can be found in the resources section.

### Human Resources Considerations

Leaders within the organization must remain focused on their employees' physical and emotional wellbeing. It is not enough to establish physical safety measures — employers must also ensure that employees feel safe and, accordingly, should review their human resources policies including absence and leave, work from home, travel, employee onboarding, job role evaluation, transitions and employee exits, recruiting, communications, employee engagement, compensation, compliance, and benefits.

### Employee Absenteeism

Plan for employee absenteeism and shortage. Employees may be absent and unable to return to work due to illness, caring for ill family members, or the dismissal or cancellation of early childhood programs and schools. Make contact with employees well in advance to determine their status. Modify your work practices by considering efforts like cross-training employees, utilizing temporary staffing agencies, and re-prioritizing sales and operations. Ensure you have adequately trained staff to open and meet business demands.

Additionally, examine your current company leave policies such as sick, medical and family leave. Adjustments may be needed according to COVID-19-related guidance and the EEOC to make policies more flexible.

Finally, evaluate work travel needs and consider alternative means for doing business. If travel is essential:

- Develop protocols to protect your employees in accordance with state travel plans and public health guidance.
- Determine whether the employee is allowed to return to work, interface with customers or self-isolate at home depending on travel destination.
- Require employees to follow company protocols such as wearing face coverings/masks and gloves, and practicing hand hygiene.



STEP  
2

# EMPLOYEES: IMPLEMENTATION OF POLICIES AND PROCEDURES BY ROLE AND FUNCTION

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Area	Issue/Concern	Considerations
<b>Absence and Leave</b>	Do you intend to limit paid time off (PTO) requests as you are ramping back up to normal operations?	<ul style="list-style-type: none"> <li>• Employees may lose or forfeit PTO due to policy maximums/carryover provisions.</li> <li>• Change PTO maximum/carryover policy provisions.</li> <li>• Allow cash out of PTO to allow employees to reduce bank amounts rather than lose or forfeit PTO.</li> </ul>
	How will you handle leave requests specific to COVID-19?	<ul style="list-style-type: none"> <li>• Establish emergency leave form to be used for COVID-19-related leave.</li> </ul>
	Do you need updates to your bereavement leave?	<ul style="list-style-type: none"> <li>• Revise bereavement leave policies.</li> </ul>
<b>Work From Home</b>	Do your current policies reflect the new business environment?	<ul style="list-style-type: none"> <li>• Review and revise work-from-home and child care policies as needed.</li> <li>• Respond to employee requests to continue to work from home, including long-term arrangements.</li> <li>• Update technology to support virtual workers.</li> <li>• Examine long-term cost savings or impact of offering permanent remote work.</li> </ul>
<b>Travel</b>	How will you reintroduce business travel?	<ul style="list-style-type: none"> <li>• Consult with your risk management team to review and revise corporate travel policies as needed.</li> <li>• Define and begin with essential business travel only.</li> </ul>

## STEP 2

### Employee Involvement in Change Management

Navigating an ever-evolving risk such as a pandemic will require a change to policies, procedures, processes and other components. Keep employees involved and seek employee input at all levels to help employees embrace proposed changes. Sales, inventory management, delivery, customer service and hours of operation can all be altered in order to mitigate loss during these chaotic times.

### Employee Health and Wellness Coaching

Plan for and implement more frequent employee interactions by midlevel management to ensure that employees are working safely. Implement pre-shift or daily COVID-19 updates and safety talks.

Develop, obtain and share resources to educate employees on COVID-19. The CDC has assembled a collection of [communication resources](#) such as guidance documents, printable materials, posters, videos, etc. More resources may be available from your local and state health departments. Encourage employees to utilize your EAPs to help cope with aspects of returning or not returning to work, work-life balance and overall wellbeing.

Develop and share your company pandemic response plan as well as your revised policies and procedures with all employees.

### COVID-19 Record-Keeping and Reporting Requirements

Understand the difference between OSHA recordable and reportable incidents. Recordable events are work-related injuries and illnesses that need to be managed and documented on the OSHA 300 log as required by OSHA's record-keeping requirements. However, some low-risk industries are exempt from OSHA record-keeping. Reportable incidents such as fatalities, amputations, loss of an eye and hospitalizations must be reported to OSHA within a certain timeframe.

COVID-19 and OSHA record-keeping: The employer should confirm if they are exempt from OSHA record-keeping. If not, they are required to maintain work-related injuries and illness records. Employers are only responsible for recording cases of COVID-19 if all of the following are met:

- The case is a confirmed case of COVID-19 as outlined by the CDC.
- The case is work-related as defined by OSHA in 29 CFR 1904.5.
- The case involves one or more of the general recording criteria as outlined in 29 CFR 1904.7, such as death, days away from work, restricted duty, medical treatment beyond first aid, etc.

Note: Due to the widespread impact of COVID-19, determining work-relatedness may be challenging for some employers. In these situations, the employer must evaluate the employee's work duties and environment to decide whether or not one or more events or exposures in the work environment either caused or contributed to the resulting condition, or significantly aggravated a preexisting condition.

- Follow the OSHA guidance on record-keeping to stay up to date: <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5>
- Check for revisions to OSHA's COVID-19 enforcement, and monitor updates to OSHA's COVID-19 website.

## STEP 2

### Labor Relations

If your financial institution is part of the Communications Workers of America (CWA), coordinate with and educate on the union's company pandemic response plan, including developed and revised policies and protocols.

Consult with a labor attorney if you have questions regarding policies and protocols.

### Pandemic Response Team (PRT)

Due to the uncertainty of the length of the pandemic, a PRT should be created to address the current pandemic situation, a possible second wave of the pandemic and potential future pandemics. The PRT should be responsible for the following (but not limited to it):

- Developing, implementing and adopting a company pandemic response plan
- Establishing branch- or site-specific protocols
- Monitoring guidance from state and local entities, the CDC, and any industry-specific guidelines and requirements



STEP  
3

**GOAL:** Ensure your facilities can safely resume operations. This could include third-party cleaning and disinfection, facility safety checks, assessment of technology security, and the potential design and installation of new technologies intended to mitigate exposures from HVAC and other building systems.

## FACILITIES AND EQUIPMENT: SANITATION, LIFE SAFETY, BUILDING SYSTEMS AND SOCIAL DISTANCING

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It's important to follow current and future local, state and federal; CDC; National Fire Protection Agency (NFPA); American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE); and OSHA guidelines. Documentation of the steps you are taking to prepare your facilities and communication to employees continues to be a critical part of the process. Facility design may require adjustments as well as occupancy limitations to maintain compliance with guidelines and best practices.

### Facilities Assessment

#### Physical Assessment of Facility

The physical assessment of your facility should include checks of site security measures and premises protection devices such as all alarm, camera, surveillance and sprinkler systems; lighting; emergency exits; and flushing of the potable water supply. You can reference the National Fire Protection Association's [NFPA 101®—Life Safety Code®](#) for a comprehensive listing of Life Safety Code aspects. In case your property has been closed due to COVID-19 restrictions, further safety assessments may be needed to ensure your property does not pose any hazards to guests, visitors and customers. This includes trip and fall hazards like uneven walking surfaces, potholes and cracks in surfaces.

#### HVAC

Building heating, ventilation and air-conditioning systems are critical to maintaining a safe, healthy and comfortable environment for employees and customers. Due to the risk of mold and biological hazards, including COVID-19, in building HVAC systems, prior to reopening, system filters should be changed according to the manufacturer's recommendations.

ASHRAE provides information on [reducing airborne exposures of COVID-19 as related to HVAC components](#). Building maintenance staff should follow all company safety procedures, wear PPE, follow OSHA standards, and use caution when changing and handling system filters.

According to ASHRAE:

- Filters should be handled as to not dislodge trapped particles and biological contaminants.
- Place filters in a sealed bag before transporting through the building and for disposal.
- If an outside contractor is utilized, review and coordinate safety policies and practices, and verify that the contractor's certificate of insurance (COI) is current with adequate coverage limits.

# STEP 3

## Prepare Your Facility for Social Distancing

Assess facilities and branches to determine how social distancing will be incorporated into work areas to help protect employees (which may help prevent employer liability) and customers. Consult your local health department and state and federal authorities' current guidance and orders on the spatial arrangement of tables, chairs, counters, kiosks and desks. After you have prepared your facility to allow for social distancing, it's critical that you communicate expectations and guidelines to your employees so they understand the protocols in place. Key measures include:

- Signage communicating personal hygiene and company policies and protocols for visitor and employee safety as related to COVID-19
- Arranging your lobby and waiting area chairs for six-foot spacing
- Installing markers on chairs and tables to identify which ones cannot be used due to social distancing
- Plans to reduce/limit in-person interactions
- Scheduling changes
- Physical barriers such as Plexiglas shields; partitions; and portable, retractable belt stanchions for restricting access and directing customer flow
- Providing sanitizing wipes for use after each transaction
- Ensuring that employees stay six feet apart by using spatial arrangements or installing barriers in work areas
- Arranging common areas such as break rooms and lunchrooms to accommodate social distancing
- Not allowing the sharing of office workspace items such as phones, computers, etc.
- Reducing the size of meetings, employee training sessions and other gatherings in accordance with local and recommended guidance
- Using virtual and audio training capabilities if possible
- Encouraging working remotely when possible

## Facility Disinfection

Disinfect facility and work areas prior to reopening and before employees return to work. Refer to CDC guidelines for [cleaning and disinfecting your facility](#). EPA [registered disinfectants](#) should be used.

Determine procedures and frequency for periodic (e.g., after each use, daily) disinfection of work surfaces, controls and high-contact surfaces such as doorknobs, touch screens, control panels, time clocks, tabletops, break room/cafeteria facilities, handrails, hand-washing stations, restroom facilities, money-counting machines, ATMs, dollies, carts, safe handles and doors, safes, and pneumatic tube canisters for drive-throughs.

Determine who will conduct the disinfection and ensure [safety data sheets](#) (SDSs) are obtained and reviewed for hazardous cleaning chemicals before use. Employers must provide training to workers at a level and in a language they can understand. You may also obtain SDSs for cleaners and chemicals from the manufacturer's website. Develop a log to document the cleaning and sanitizing of your facility.

Assess the supply of disinfectant materials such as sanitizing wipes, sanitizer-dispensing stations, soap, towels and tissues in order to maintain an abundant stock. Monitor inventory to prevent shortages.



STEP  
3

### **Tenants, Landlords and Property Managers**

If you are a tenant, contact your landlord and/or property manager to inquire about facility assessments, HVAC system cleaning and servicing, and facility disinfection. You may need to review lease agreements to determine responsibility for assessments, servicing, cleaning, etc.

### **Cybersecurity Assessment**

Computer, IT and point of sale (POS) systems should be checked for cloud system, device software and security updates before storing or transmitting sensitive data. Company policies on personal use of computers and training on email phishing scams should be reiterated.

### **Insurance Policy Review and Communication**

Review insurance policies for expiration dates and changes in coverages. Contact your Gallagher team and insurance carrier to inform them that you are reopening and that the building is no longer vacant. Discuss claim-reporting procedures for confirmed employee cases of COVID-19 with your management team.



# STEP 4

**GOAL:** A review of your systems and processes to ensure vendor compliance, identification of supply chain needs for increased PPE and sanitizer demands, and evaluation of how your organization's compliance with current pandemic requirements can affect customers and the public.

## OPERATION SUPPLY CHAIN AND THIRD-PARTY SERVICES

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While financial institutions typically do not have large, complex supply chains like manufacturing and retail, financial institutions can examine and evaluate processes of loan provisioning, financial settlements and armored transport services. For your business to function properly, new considerations should be made for payments, lending, investments, etc.; how a disruption could impact any of the steps associated with these financial activities; and how long it would take for the system or process to recover. The marketplace has changed, and may necessitate partnering with new or additional vendors and implementing contingency plans should a vendor be impacted during recovery. Continue to communicate with your partners to ensure you have a backup plan should there be a breakdown in any of your institutions' banking processes. This may involve increasing inventory levels of high-volume products/services. It may also include making sure your vendors are in compliance with protocols, and are providing proper documentation to indicate ongoing safety checks and operational continuity.

### Vendor Contracts, Agreements and COIs

Identify essential third-party vendors and contractors, as well as secondary or alternative vendors. Discuss with them their commitment and strategies regarding how they will serve you during this time. To protect your resources, products and downstream consumers, your vendor contracts, agreements and COIs must be reviewed. Review your contracts to ensure performance obligations are met and to identify any variations. Regularly audit suppliers, vendors and contractors to assess upstream exposure. Gain as much visibility as possible into all modes of the supply process. Evaluate the need to utilize or modify agreements, such as indemnification agreements. In order to protect your business, ensure that COIs have current in-force dates, adequate coverage limits and name you as an additional insured. You can reach out to your Gallagher agent to assist you with your COIs.

### Vendor Deliveries and Screening

To help manage and prevent the spread of COVID-19, new processes and policies may need to be implemented. Determine whether vendors and armored transport deliveries can be restricted to single points of contact and take place in restricted areas, where possible. Advise vendors of your PPE requirements (i.e., face mask) and your commitment to cleaning, sanitation and maintenance requirements, and post signs near receiving doors and hand-sanitizing stations. Ensure that the vendors are willing and able to abide by your requirements, and share that same commitment. Evaluate whether you need to implement temperature scanning of vendors. If you are advised that a vendor representative that has been to your facility has a confirmed case of COVID-19, contact tracing should be conducted to determine employee contact with the vendor, with subsequent employee notification and procedures.



STEP  
5

**GOAL:** Reaffirm your relationships with clients, customers and the general public with ongoing communication. Make it clear what policies, procedures and protection methodologies you've implemented, and how you're properly using physical barriers, management controls and procedures to maintain safety and an optimal workplace environment.

## CUSTOMER, CLIENT AND PUBLIC RELATIONSHIPS

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Customers, clients and the public should be aware of the safeguards you have put in place to ensure their safety. Actively monitoring feedback from these stakeholders will help validate the safety measures put in place. A regular review of the changing safety recommendations from the CDC; OSHA; local, state and federal authorities; and other governing bodies within your jurisdiction will help ensure your organization's compliance with health and safety mandates and requirements.

### Pre-Arrival Communications

As you begin to allow clients, vendors and contractors back into your facilities, it will be important for them to understand your commitment to their health and safety as well as that of your employees. Email, phone calls, social media and clear notices posted to entrances may be useful in communicating your message with advance notification of what will be expected. Consideration should be made for posting a greeter at the entrance to give instructions to visitors entering the premises.

### Security and Temperature Screening

As a business owner, you should assess the need to conduct temperature scanning of customers and guests. Company temperature screening policy and signage should be conspicuously posted at entrances, and on advertisements and company websites. To protect customer privacy, temperature screening should be done in a manner that others cannot see or hear the results of the temperature scan. As with cleaning and sanitizing, you should determine who will conduct the temperature scanning and train them on the proper use of the equipment, scanning technique, how to greet customers while explaining the process, and how to convey to anyone whose temperature exceeds 100.4 that they will not be allowed inside the facility for in-person service. However, remind them that the drive-though is available for their convenience.

Employees need to understand and be able to convey to customers that the company has implemented this policy to protect the health and safety of their employees, and to serve the public health goal of transmission prevention. If masks or face coverings are required, signs must be conspicuously posted at all entrances and indicate in the sign verbiage that this requirement is for the safety of employees and customers. Lastly, the employee should be trained to know when to notify a member of management or security to deal with uncooperative customers. An optional measure could include creating a handout that clearly defines the company screening policy, rationale, reasons for denied entry, and CDC suggestions regarding self-isolation and when to see a doctor.

If possible, consider hosting virtual meetings or online services rather than having customers enter your facilities. Rather than using waiting rooms or lobbies, have clients call when they arrive on-site, then escort them directly to the meeting room. If meeting in person is required, set up seating at meeting tables to maintain six feet of distance. Remove extra chairs and direct guests to seating. Provide hand sanitizer, sanitized pens and copies of documents to limit the exchange of those items. Remember to sanitize the area before and after each guest.



STEP  
5

### Face Coverings and Social Distancing Requirements

In many areas, face coverings that cover the mouth and nose are required by state and/or local jurisdictions. Your company should comply with those requirements both for your employees and your guests while also being mindful of maintaining proper security protocols. Social distancing is not second nature and, in many cases, breaks social norms. We are used to body language and facial expressions when greeting others and thanking them for their business. Help visitors by setting the example and acknowledging that it may be uncomfortable.

### Offer Alternative Choices for Customers

Remind visitors of alternative banking choices such as online banking, drive-through services or ATMs. These choices would create social distance for the customer and financial institution employees.

### Liability Waivers

In these unprecedented times, the pandemic has created a degree of uncertainty and apprehension. A proactive measure for you to consider is to implement the use of liability waivers to protect you from future claims of COVID-19 exposure while providing services. While Gallagher does not provide legal advice, the use of liability waivers is for your consideration only. If you determine you need liability waivers, you should consult an attorney on the use and language.

### Communicating Closing Due to a Confirmed Case of COVID-19

If an employee is diagnosed with COVID-19, follow [CDC](#) guidance. You will find information on closing off affected areas of your facility, cleaning and disinfecting, and adhering to public health recommendations. Communicating confirmed employee cases should be done via signage entrances and on the company website.

### Property and Casualty Claim Reporting

Gallagher claim advocate reporting of property and casualty claims has not changed. You should consult with your Gallagher claim advocate or Gallagher agent if you have any questions regarding claim reporting or specific claims

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## RESOURCES

[Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person With Suspected or Confirmed COVID-19](#)

[Gallagher Coronavirus \(COVID-19\) Pandemic Information Hub](#)

[Gallagher COVID-19 Return-to-Workplace Resource Center](#)

[Gallagher Bassett COVID-19 Resource Center](#)

[Gallagher Bassett Contact Tracing](#)

[Gallagher Bassett Technical Services](#)

[CDC – COVID-19 Employer Information for Banks](#)

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The road back to normal will most likely not be linear. Our response must be nimble and adjust to conditions, day by day in some cases. Clear and concise communication with employees, visitors and partnering businesses is essential. Be prepared to make changes as new mandates are generated by local, state or national agencies. Your Gallagher National Risk Control team is here to help you through these challenging times. Please let us know how we can assist you.

Gallagher continues to monitor the potential risks related to returning to the workplace through OSHA, the CDC, the WHO, and state and federal regulatory authorities.

Please visit [ajg.com/us/pandemic-preparedness](http://ajg.com/us/pandemic-preparedness) for the latest information.

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