

Will workplace health and safety provide your license to operate?

Occupational health and safety risk management in non-traditional times

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Effective risk controls

As always, it is important to consult with your people – including employees, contractors and volunteers where relevant – when updating or preparing your WHS plan. Workers may know good ways to control risks, or else would correct control strategy that would not work well. And in this context they need to feel physically and psychologically safe at work (and possibly more than ever).

Can effective workplace health and safety management support industries to recover?

While the COVID-19 pandemic is far from over, we are turning our minds to recovery, however, we won't be returning to business as usual right now. Social distancing, tracking and tracing, and border closures are likely to continue until the virus is behind us. As most industries **barely demonstrated** their resilience, organisations will need to consider what the “new normal” will be, and how they will protect their employees, contractors and customers from COVID-19 related risks as they rebuild or maintain their businesses. Business leaders need to plan bounce forward into the new normal.

Each workplace should already have a work health and safety (WHS) plan or framework in place which outlines how hazards are managed and defines processes aimed at keeping workers safe. Yet a development of a comprehensive WHS plan which clearly outlines how workers and the community will be protected in the context of management of and recovery from the global pandemic is essential. Though **the government of Azerbaijan has not yet expressed its strict expectations from organizations relating to the recovery phase and no proper guidelines/regulatory standards are available**, the absence of a carefully considered plan for a “return to work” may put an organisation's licence to operate at risk should the government, regulators or the community determine the organisation is putting its people or the community at risk.

With so much focus on COVID-19, are some risks being overlooked?

As we will need to move towards the recovery phase, we need to ensure that all risks are being adequately ascertained and managed. We're all familiar with the traditional approach to managing risk: identify, assess and control, and consult and communicate with employees. But with the primary focus on reducing the number of COVID-19 infection transmission, are we missing some of the less obvious risks? Indeed, it is easy to lose sight of another WHS risks that have emerged or increased as a result of this pandemic. These are, amongst others, stress and fatigue, **biopsychosocial risks and various risks associated with a contingent workforce**. It is critical that organisations revise their WHS risk profiles to ensure they incorporate and make allowance for new COVID-19-related risk and controls.

Selecting the right controls amidst the uncertainty

In this rapidly changing and evolving landscape, organisations need to be regularly reviewing the effectiveness of controls. Organisations should rely on proven WHS risk management principles such as the hierarchy of control and workforce consultation to enable effective selection and implementation of suitable control measures – but be more agile in their application. In addition, organisations should ask:

- ▶ Is there evidence to confirm that controls prevent or reduce risk?
- ▶ Will application of these controls pose a new risk to the business, and, if so, how will this be managed?
- ▶ How have COVID-19 controls impacted old (pre-pandemic) controls?

Monitoring the health of workers

Monitoring the health of workers now becomes critical to maintain a licence to operate. Organisations will need to establish a process for doing just that - if they haven't done so already - to ensure employees are safe to be in the workplace. Due process needs to be applied to how this sensitive information is to be managed, monitored and accessed. Organisations may consider the need to introduce usage of various tracing apps. The ability to trace worker movements within your own facilities or offices, and have timely and reliable access to such information becomes paramount in the case of an infection among your workforce.



Do you consider new and old controls effective?

The need to demonstrate that controls are in place and working effectively has never been so acute – organisations need to demonstrate to governments, regulators, customers, investors and communities that they are effectively managing risks in order to maintain a licence to operate.

While Frontline Management will be critical to ensure controls are enforced appropriately and standards are upheld, a more stringent form of ongoing direct reporting to management and the Board must be introduced. As knowledge about COVID-19 continues to expand, controls will need regular review, and information will need to be promptly presented to leadership teams to enable them to take timely and informed decisions and ensure all compliance requirements are duly met.

Ensuring the effectiveness of other controls must also take place to ascertain if any modifications are needed to be made to existing controls. While organizations and their workforce focus predominantly on potential COVID-19 related risks, it is imperative to keep track of conventional risks and pitfalls and ensure due processes aimed at prevention thereof. Social (physical) distancing requirements shall compel organisations to think differently about how WHS auditing and assurance activities continue. Remote auditing supported by mobile cameras and drones can be effective and efficient, and as restrictions are gradually lifted and borders open up, some on-site auditing will be able to be performed.

An effective WHS assurance program should be included in your COVID-19 recovery plan; not only will it support improved risk management and compliance with WHS regulatory obligations, it will support organisations to survive now and thrive in future.

Communication is key

Once a WHS plan for recovery is agreed, it is critical to ensure the relevant people are informed about it. This should include, first and foremost, your own employees, but also third-party contractors, volunteers, and customers. Essential information must be communicated in a clear and simple manner so that it is well understood. To ensure this, simple language, visual aids, and, if needs be, translations have to be used. Effective communication should also explain *why* people are being instructed to take specific action.

When it comes to managing WHS risks, they should always be high in the agenda, but now even more so! In the context of COVID-19, knowledge and circumstances can change by the day. Make sure you're checking in with your people and reviewing the suitability and effectiveness of your WHS plan on a regular basis. In the early stages, this might even be as frequent as daily or weekly.

Resources sector as an example

Azerbaijan's resource sector is applying traditional OHS risk management principles to keep its workforce, families and communities safe and healthy, while maintaining sites operating. In the light of existing and emerging new risks, a variety of controls should be implemented across the sector. These are:

- ▶ Physical distancing and managing of working schedule (start, breaktime, and finish times) and redirection of people streams to limit physical interactions
- ▶ Limiting the number of people at operational facilities to business critical employees and contractors, alike
- ▶ Providing alternative work options for vulnerable employees
- ▶ Regular health screenings and temperature checks at point of origin, transit and work sites
- ▶ Introducing a range of mental-health and wellbeing initiatives to boost resilience, connection with others, and build a sense of community
- ▶ Increased awareness and implementation of fatigue management controls to support roster changes
- ▶ Having a trace app and monitoring plans in place
- ▶ Isolation and case tracking plans and facilities in the event of an anomaly.

Controls should continuously be monitored and tested to ensure their relevance and effectiveness. If necessary, controls should be modified or improved. This allows executive and leadership teams to stay informed and enable them to make timely and effective decisions as required.

Take action – NOW

The response to the immediate threats of COVID-19 is no longer taking precedence. The effective management of existing, new and emerging WHS risks and impacts remain a challenge for the coming months and years.

Have you identified all COVID-19 risks?

- ▶ Be open minded, consult with your workforce to determine all WHS risks
- ▶ Define your WHS risk profile is specific to your operating context, as well as the key risks relevant to your workers whether they're working from home or at their usual workplace
- ▶ Consider both existing, new and emerging risks due to operational changes and new ways of working.

Are your controls appropriate and effective?

- ▶ Consult with your workforce and utilise the hierarchy of controls to determine effective controls
- ▶ Assess performance requirements of the controls and how they could be verified
- ▶ Track progress and evaluate the effectiveness of controls seeking feedback from your people on what is/is not working
- ▶ Monitor effective implementation of identified controls through a robust assurance program.

Be agile and adaptive

- ▶ Revisit your risk profile on a regular basis in response to ongoing changes as the pandemic and control requirements evolve.
- ▶ Ensure appropriate reporting structures are in place to enable rapid and effective decision making during the pandemic.

Need help?

EY health and safety professionals can assist you to develop and/or implement a WHS plan for "return to work" as workplaces adjust to "new normal" and move to recovery.



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