Answering our clients' questions on
Pandemic Risk Management

How **ISO 45001** and **ISO 22301** can support your organization's response to pandemics such as **COVID-19**

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Has your business been impacted by the **Coronavirus?**

As COVID-19 continues to spread globally, many of our clients have been asking what steps they should be taking.

First and foremost is to follow the trusted sources of advice and information that are being given by governments and the World Health Organization. Then your internal risk management approach can be applied. This should consider both proactive and reactive requirements within your occupational health and safety management and business continuity management systems to help build resilience when managing a pandemic event.

It is essential that any risk management is proportionate and that any actions and controls to manage risk do not introduce stigma and discrimination into the workplace. Recent diseases such as Ebola, SARS, MERS, and COVID-19 have stemmed from specific countries. Unfortunately, this has often led to racial abuse and discrimination within workplaces and in the wider public. Do not make determinations of risk based on race or country of origin — use only risk guidance from credible sources such as government health authorities and the World Health Organization and be sure to maintain the confidentiality of people confirmed with infections.

Risk management approaches with ISO 45001 and ISO 22301:

- Many clients certify to one or both of these standards. ISO 45001 or the occupational health and safety management system standard (OH&SMS), helps identify hazards and risks to your workforce such as those arising from pandemics. ISO 22301 is the business continuity management system (BCMS) — this helps organizations prepare and deal with disruption, such as the global spread of a pandemic, like COVID-19.

- Both standards follow the same high-level structure (HLS) which enables them to be integrated effectively. Although these standards are designed to help organizations anticipate and be prepared for a variety of situations, our clients have asked us for information on how they can be used for pandemic risk management.

Below is a summary of some of the key elements to consider

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Risk management approaches with ISO 45001 and ISO 22301

HLS	ISO 45001 OH&SMS	ISO 22301 BCMS
Definitions	**Injury and ill-health:** adverse effect on physical, mental or cognitive condition of a person **Hazard:** source with a potential to cause injury and ill-health **Incident:** Occurrence arising out of, or in the course of, work that could or does result in injury and ill-health **Note:** Pandemics clearly fall within the scope of these definitions.	**Disruption**: incident, whether anticipated or unanticipated, that causes an unplanned, negative deviation from the expected delivery of products and services according to an organization's objectives **Incident**: event that can be, or could lead to, a disruption, loss, emergency or crisis **Impact**: outcome of a disruption affecting objectives **Note:** Pandemics clearly falls within the scope of this definition

Clauses	ISO 45001 OH&SMS	ISO 22301 BCMS
Context	Organizations must identify internal and external issues that are relevant to its purpose and that affect its ability to achieve the intended outcome of the management system (MS). Pandemics are one such issue, that should be identified. The needs and expectations of workers and other interested parties must be considered. Workers will have direct needs, concerns, and expectations with regard to pandemics, as will stakeholders such as patients, clients, suppliers, the Public, and even health authorities and regulators. Additionally, with pandemics, it will be necessary to consider families, particularly those with vulnerable dependents who may be at increased risk of becoming infected, or may require extended care if they become ill. This will then inform the risks and opportunities in Clause 6, Planning.	
Leadership	Top management must demonstrate leadership and commitment, ensuring that the MS is integrated with other business processes, that the necessary resources are in place, the importance of the MS is communicated, and continual improvement is demonstrated. All of these elements apply equally when considering the risks from pandemics, such as COVID-19. Top management also need to ensure that roles, responsibilities and authorities are assigned. In relation to pandemics, there may be specific roles, responsibilities and authorities. This may be additional authority provided to line managers to let employees work from home during an incident; liaison with health authorities; or even a specific 'COVID-19' management team bringing together necessary expertise in occupational health, business continuity, communications, operations etc. ISO 45001 also includes requirements with regard to the consultation and participation of workers – this would need to include pandemic risk management activities.	

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Risk management approaches with ISO 45001 and ISO 22301

Clauses	ISO 45001 OH&SMS	ISO 22301 BCMS
	The risks and opportunities associated with pandemics need to be addressed, so that the MS accomplish its intended outcomes; reduces or prevents undesired effects, and achieves continual improvement. **Hazard identification:** Pandemics should be identified during this phase.	

HLS	ISO 45001 OH&SMS	ISO 22301 BCMS
Planning	**Assessment of risk and opportunities:** COVID-19 will pose a number of health and safety risks, as well as risks to the OH&SMS. Additional risks may arise such as delayed or limited response from emergency services where an incident unrelated to the pandemic arises. Increased handwashing will increase the likelihood of dermatitis. There will also be opportunities such as introducing home working and reducing seasonal flu sickness rates as workers follow improved hygiene routines.	After the organization has identified the context in which they operate and therefore the needs and expectations of interested parties, they need to determine the risks and opportunities that need to be addressed to give assurance that the BCMS can achieve what it's supposed to achieve. Business continuity objectives need to be established to ensure that the effectiveness of the BCMS can be measured.
Support	The necessary resources, competency, awareness, and communication will be required in relation to the pandemic. This may mean additional alcohol-based hand sanitisers, licences for remote access to computer systems, repatriation mechanisms, access to additional health expertise, emotional and psychological support, etc. Resources, in particular people, should be carefully reviewed. Critical workers should be identified, and the implications of their absence assessed. This may include top management, safety critical workers or key contractors. Consideration of emergencies during holidays, shut down or other times when there may be reduced resourcing should also be considered. This should take account of any travel restrictions. Workers who use public transport may not be able to attend work if travel restrictions are in place. Where remote working is required, access to computer systems is prone to outside attacks and threats, especially with regard to fraudulent COVID-19 scams. Every organization needs to review their information security awareness program and ensure the necessary resources to provide regular updates / training to everyone working remotely. Organizations should also investigate MFA (Multi-factor-authentication) usage and review if system access needs to be limited, e.g. by time-of-day or IP address. Many risk assessments don't address a large scale remotework force and therefore organizations are not always implementing suitable controls.	

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Clauses	ISO 45001 OH&SMS	ISO 22301 BCMS
Operation	Organizations will plan, implement, control, and maintain the processes necessary for the MS system. This will include any specific to pandemic risk management.	
	Temporary changes associated with pandemic risk, such as changes to working patterns, or temporary closure of sites need to be managed effectively. The impact on procurement and the supply chain needs to be carefully assessed. There may be a range of health and safety implications. Existing hazards and risks (unrelated to the pandemic) could increase if key contractors or resources are unavailable; for instance if water treatment experts and chemicals for managing Legionella are unavailable, Legionella risk could increase. There may be urgency to find temporary contractors or outsourcing but procurement processes should not be circumvented — new health and safety risks could be introduced and reputational risks may increase if the new supplier is not carefully vetted.	Every organization needs documented business continuity plans (BCP) that describe what to do in case of disruptions, addressing internal and external interdependencies. These BCPs may include detailed descriptions of the response structure for each team and the relationships between teams. The process / protocols for internal and external procedures need to include what, when, with whom, and how to communicate. The organization must also have plans in place for the recovery phase, where business activities are restored, and replacing any temporary measures adopted during the disruption.
	Emergency preparedness: Processes for dealing with emergencies need to be put in place which include establishing planned responses, training people on the response, and checking that the plan will work by testing it regularly. An effective way of ensuring the emergency plan is fit for purpose, is to use ISO 22301 as this represents global good practice in managing disruption.	The organization has to identify and select business continuity strategies that consider options for before, during, and after disruption. The business continuity arrangements have to be evaluated. A pandemic event, such as COVID-19, is an opportunity to evaluate the plan and strategies.

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