

**CODE OF PRACTICE FOR SFIs MANAGING CATASTROPHE-  
RELATED STAFF ISSUES**

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**CLEARING BANKS ASSOCIATION (CBA)**

**&**

**ASSOCIATION OF INTERNATIONAL BANKS AND TRUST  
COMPANIES (AIBT)**

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# **Code of Practice for SFIs Managing Catastrophe-Related Staff Issues**

## **PREAMBLE**

This document jointly prepared by the Association of International Banks and Trusts (AIBT) and the Clearing Banks Association (CBA) provides guidance to Supervised Financial Institutions (SFIs) of the Central Bank of the Bahamas on staff management protocols before, during and after a major hurricane. For the purposes of this document, a catastrophic hurricane is defined as a category 4 or 5. Nevertheless, the guidance provided, can be applied in general.

The guidance outlined in this document is based on industry best practices. Not all of the practices outlined in this document will be applicable to each licensee. SFIs should consider the guidance in the context of their size, complexity, the risk appetite and Business Continuity Plans (BCPs), assessing the sufficiency of their staff management protocols.

All SFIs should appreciate the benefits of the continuity principles of advance planning, periodic review and updates of the documented plan(s), as well as periodic testing.

It is to be noted that in case of a catastrophic hurricane it is imperative that SFIs have defined means of communicating with staff, evacuation plans and staff assistance programs as relevant.

This document does not establish a statutory requirement of the Central Bank. The Central Bank's supervisory expectation, however, is that SFIs will carefully consider this document in forming their BCPs.

## **ARRANGEMENT OF SECTIONS**

Section A: Establishing Communication Protocols

Section B: Communication with Staff

Section C: Staff Evacuation Protocols

Section D: Staff Assistance Programs

## **SECTION A:**

### **ESTABLISHING COMMUNICATION PROTOCOLS**

In preparing for the hurricane season, communication protocols should be defined and communicated to the staff body. The details of a communication plan should be readily accessible by staff members. The communication protocols should:

#### **— *Identify Communications Lead***

For organizational wide messaging, identify and confirm the official communicator to staff

- Human Resource Department
- BCP/Crisis Communications Lead
- Managing Director, or
- Any other role as prescribed by the SFI.

Hereinafter, the role of the communication lead is referred to as the “Communications Leader”.

#### **— *Confirm Staff Contact lists***

The emergency contact list, call tree, key contacts and any other relevant list should be periodically updated and verified during the hurricane season to ensure that it remains current.

#### **— *Establish Communication Mediums/Channels***

The approved medium/channels for communicating before, during and after the storm should be determined and staff members advised. Communication mediums may vary and is dependent on the size, complexity and the risk appetite of the SFI. SFIs should consider the ability of staff to access communications and any security requirements.

Before a hurricane, communication can be made via:

- Staff meeting (non-pandemic environment)
- Email
- Dedicated Phone Number / Hotline (specific number for staff to dial into directly to receive information 36 to 24 hours before the storm)
- Company website (access live chats to communicate with staff and receive automated responses)
- Conference Calling Systems

- Messaging system approved by the organization or mass notification service
- Approved Social Media Channels
- Approved Instant Messaging Channels
- Provide key personnel with sim cards and other instrument configurations
- Test all instruments periodically

During and after a catastrophic hurricane, it can be anticipated that means of communications will be restricted. In addition to communication mediums that may be available before a hurricane, SFIs should consider less traditional communication mediums, as follows:

- Satellite Phones (to be frequently tested, and provided to Executives and / or specific Communications Leaders as prescribed by SFI.)
- Local media (e.g. radio announcements)
- People Leader (responsible for communicating directly with a specific team, can be localized to one's residential area)
- Regional Contact (one who is outside the hurricane zone and can coordinate activities/flow of information via satellite phone)

— ***Establish Communication Timeframes***

Communication timelines aid in alleviating concerns, reducing staff anxiety and facilitate preparedness. Communication to staff should commence as soon as the authorities have confirmed a catastrophic category 4 or 5 storm in the area or at minimum 96 to 72 hours before it is anticipated that a major hurricane will make landfall and continue during and after the hurricane. Clear communication timelines should be defined for key messages. Examples of key messages include:

- Notification of an impending hurricane and preparation guidelines (as soon as advised of a category 4 or 5 storm)
- Support available to staff (as soon as advised of category 4 or 5 storm)
- Key contact information (as soon as advised of a category 4 or 5 storm)
- Activation of the business continuity plan
- Office closure to align with advisory from NEMA/MET Office/Clearing Banks Association (CBA)

**Review and Update Communications Documents**

The communication protocols including an updated and verification of the emergency Contact List /Call tree should be made periodically during the hurricane season, by the person or team responsible, to ensure that it remains current and readily available.

## SECTION B:

### **COMMUNICATION WITH STAFF**

Timely and continuous communication with staff during a major hurricane is paramount. A well-defined protocol contributes to the successful implementation of the BCP.

#### **I) BEFORE THE STORM**

##### **96 HOURS:**

- a) **Activation of the BCP** – the decision to invoke the BCP 96 hours prior to a category 4 or 5 storm.
  - b) **Staff Protection/Evacuation** - the relocation of BCP team and / or a decision to relocate entire teams in the direct path of a major storm to previously identified temporary accommodations. Consideration must also be made for the time needed to ascertain valid travel documents and or testing and health visas.
  - c) **Premises protection** - decision to approve the responsible team(s) to proceed with initiation of their checklist.
- Communications Leader to communicate the decisions taken as relevant to staff and teams in accordance with the SFI BCP. Action plans should be initiated.
  - Careful consideration should be given and factored in for the premises protection team allowing them the opportunity to organize their personal preparation.
  - Communications Leader will email Hurricane Advisories to all members of staff issued by (NEMA/MET Office) starting at least 72 hours before the storm is expected in the area and encouraging staff to make personal preparation for the storm.

##### **72 HOURS:**

- Communications Leader to email all staff to verify their personal contact details within the company's electronic personal data update tool or directly with their people leader to confirm contact details.
- Human Resources to make an assessment of any special need of staff members, encourage staff in low lying areas to move inland, and consider the requirement for salary pre-payments.
- Human Resources to communicate any time-off preparation allowances.

##### **24-48 HOURS:**

- A verified list of contacts is to be provided to Communications Leaders or Team Managers as appropriate. A central contact list for all employees is to be maintained by the appropriate role/team as prescribed by the SFI.
- Communications Leader to confirm the communication protocol for during and after the storm along with the approved medium(s) for communication and key contact.
- Preparation to be made for critical staff to operate remotely, should the need arise.
- IT to ensure staff is adequately equipped to resume activity after the passage of a major hurricane in the context of the SFI BCP.

- Communications Leader to communicate timing of the office closure. SFIs are encouraged to follow the guidance issued by the Clearing Banks Association for office closure. Staff should also be encouraged to make any last minute preparations at this time.
- IT equipment and other critical equipment to shut down or failover, before the arrival of the storm.
- Communications Leader to remind employees to secure their respective work station/area to align with the company's Business Continuity Plan protocol.

## **II) DURING THE STORM**

For as long as is reasonable, contact with staff is maintained via SFI approved medium(s) for communication.

## **III) AFTER THE STORM**

All Staff are to wait for the "All Clear" by NEMA or other identified and authorized government official. To the extent possible, the Communications Leader is to confirm that all staff members and their immediate household members are well and secure. A preliminary assessment of damages are conducted.

Using the approved and established communication medium and following the "All Clear" the premises protection team to assess the damage and provide an update to the BCP/Crisis Management Committee who will approve the return to work dates for employees and reopening to the public dates.

In the event the office building is not accessible, the Communications Leader to communicate alternative working arrangement (i.e. work remotely) to all staff.

Communications Leader will advise the staff of the return to work date.

## **SECTION C:**

### **STAFF EVACUATION PROTOCOLS**

#### **I) BEFORE THE STORM**

- Consideration for the relocation of BCP teams and entire teams in the direct path of a catastrophic hurricane should be made before the arrival of the storm. This is particularly important for catastrophic hurricanes in which the local infrastructure may be severely damaged by the passage of the storm. Consideration must be made for the time needed to ascertain the valid travel documents and or testing and health visas.
- If SFIs intend to evacuate key staff before a catastrophe, they will need to consider how staff member dependents are treated. It is unreasonable to expect a staff member to leave his or her family to face a catastrophic hurricane without them, in the absence of suitable arrangements in place.

#### **II) AFTER THE STORM**

- Where there is a need to evacuate staff post a storm, the Human Resources team initiates the post storm evacuation plan.
- Communications with all previously established and agreed supporting vendors (hotels, land and sea travel agencies etc.) will be contacted for support of moving and housing staff as needed.
- HR will provide daily updates to the BCP/Crisis Committee of all people movement until the entire affected team is properly secured.

## **SECTION D:**

### **STAFF ASSISTANCE PROGRAMS**

SFIs should consider the applicability of staff assistance programs in the context of their size, complexity, the risk appetite and Business Continuity Plans (BCPs). It is at the SFI's discretion to determine the level of assistance it will provide. The SFI should assess the sufficiency of assistance programs at the beginning of the hurricane season. Staff assistance programs should contemplate the following:

- **Relocation accommodations**

The SFI may provide a form of aid (i.e. salary advance, loan, or other arrangements) to personnel identified as dwelling in areas that will be directly impacted by a category 4 or 5 hurricane for the purposes of relocating out of the path of the storm. Where applicable, aid may also be considered for dependents of affected employees upon the employee request.

- **Travel Assistance**

Offered to personnel who would require travel to relocate out of the path of the storm. The SFI may assist with travel arrangements. The SFI may also provide support via salary advance or loan to facilitate travel. Where applicable, arrangements may include dependents of the employee.

- **Early Payroll Advance**

In anticipation of a catastrophic hurricane, the SFI should consider an early payroll to aid in any recovery efforts.

- **Care Packages**

The SFI may wish to disseminate care packages consisting of hurricane supplies such as tarp, water, batteries, masks, toiletries, disinfectants, blankets, airbeds, etc. This type of employee support could also be outsourced in advance.

- **Electronic payment support**

To assist SFIs and staff to maintain payments capability, staff should be encouraged to sign up for products such as Sand Dollar as they become available, and SFIs should ensure they can make payments to staff by these methods.

### **AFTER THE STORM**

Make an updated assessment of any staff assistance requirements as necessary. The arrangements outlined in this paper can continue in the recovery period until no longer necessary.