



Development Bank of Namibia

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DBN ENVIRONMENTAL AND SOCIAL MANAGEMENT GUIDANCE FOR THE FINANCIAL INDUSTRY

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a) Version Control

The table below serves to track the key revisions made to this document for change control purposes.

Date	Version	Change Description	Author/Editor
07/09/2016	0.01	Initial Draft for first review	Manager: Environment & Social Development
28/02/2018	0.02	DBN Logo and update as per 07 April 2017 Kreditanstalt für Wiederaufbau (KfW) Development Bank Gap Assessment of the Development Bank of Namibia's (DBN) Environmental & Social Management System (ESMS)	Officer: Environment & Social Development

1. DEFINITIONS, TERMS & ABBREVIATIONS

DBN	Development Bank of Namibia
EOHS&S risks	Environmental, Occupational Health and Safety and Social
ESIA	Environmental and Social Impact Assessment
PPE	Personal Protective Equipment

2. INTRODUCTION

This guideline is designed to be used by the Development Bank of Namibia (DBN) clients to understand the nature of environmental, occupational health and safety and social (EOHS&S) risks associated with existing operations in this sector and suggested actions for businesses to manage these EOHS&S risks.

It also provides guidance for clients on potential due diligence questions to discuss with management to understand how their business is managing these EOHS&S risks. This guideline focuses on material EOHS&S risks; it is not an exhaustive list of EOHS&S risks. In managing EOHS&S risks, all businesses should be compliant with relevant EOHS&S laws and regulations and best practices.

This guideline focuses on financial intermediaries with reference to the International Finance Corporation's Environmental, Health and Safety (EHS) General Guidelines. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP).

3. SCOPE

This guidance is applicable to all the Development Bank of Namibia's (DBN) clients/customers who intends to or have set up operations in this sector category and, extends to their assets, facilities, operations, projects and activities, including activities undertaken by any contractor on behalf of the Company, business units and managed operations including corporate/administration offices and other facilities located off site.

4. INTENT

The intent of this guidance note is to assist prospective clients to develop a thorough Environmental and Social Management Plan (ESMP) for their activities and merely act as a guidance and is not comprehensive nor exhaustive.

5. BACKGROUND TO THE SECTOR

The financial industry is recognised around the world for its commitment to compliance and prudent management of financial and market risks. We trust that if they are committed to protection of the environment and securing safety and health of their employees, they can manage the occupational risks in their workplaces equally well.

Employees are one of the most valuable assets of any organizations. We therefore have every reason to believe that employers will put sufficient resources to control risks at work with a view to protecting their workforce

The majority of financial industry employees work in lower risk environments and are not exposed to significant occupational health and safety hazards. Nevertheless, programme of initiatives should be put in place to ensure that there is continuous improvement of health and safety, environmental and social performance. Compliance to these requirements will enable any institution to protect against environmental non-compliance and, its workforce against occupational injuries and ill health.

6. KEY EOHSS RISKS

Below are the material EOHSS risks associated with this sector and key measures to manage them. Where gaps are found in the management of key EOHSS risks, the DBN E&S risk management measures may form part of a corrective E&S action plan agreed with clients.

6.1. Health, Safety and Environmental (HSE) Management System

An HSE MS is the basis for ensuring the health and safety of employees at work and the environment in which you operate. It means a system that provides HSE management functions in an enterprise including -

- a) the planning, developing, organizing and implementing of an HSE policy; and
- b) the measuring or auditing, and reviewing of the performance of those functions.

6.1.1. Mitigation measures

- It is a Legal requirement and obligation under The Labour Act No 11 of 2007 and Government Notice No. 156 Labour Act, 1992: Regulations relating to the health and safety Of Employees at work for an employer to ensure the health and safety of all his/her employees at work.
- To help the management comply with the statutory requirements and international best practice in order to achieve higher health and safety standards at work, it is essential to put in place an efficient HSE management system to effectively identify strengths and weaknesses, prevent accidents and strive for continuous improvement.
- A safe and healthy working environment not only increases employees' efficiency and productivity but also reduces insurance and compensation costs.

6.2. In-house safety rules

In-house safety rules should cover areas ranging from operation of machinery, work processes, use of personal protective equipment, fire and material handling safety, to emergency response procedures.

6.3. Hazard analysis and control measures

Hazard analysis provides a means to manage job related hazards in a way that eliminates or reduces them to an acceptable level.

6.3.1. Mitigation measures

- Where engineering control methods are not feasible, suitable personal protective equipment should be provided as a last resort for i.e. manual handling, file compacta, exit arrangements, vault, shredder, glare, housekeeping, air quality, coin counting etc.

6.4. Emergency preparedness

Being prepared for emergencies by developing, communicating and executing plans prescribing the effective management of emergency situations minimizes injuries, illness, property damage, environmental harm and public concern.

6.4.1. Mitigation measures

- As part of contingency planning in financial institutions, an emergency response plan requires full commitment from top management and should be promulgated to various levels of staff.

6.5. Evaluation, selection and control of sub-contractors

For companies that have substantially contracted out its operations to sub-contractors (i.e. security services, maintenance, cleaning and renovations contractors), it is necessary to prepare guidelines for in-house personnel to evaluate, select and control their sub-contractors' environmental and health and safety performance.

6.5.1. Mitigation measures

- The safety and health performance of the sub-contractors should be an important criterion in selection.

6.6. Incorporating Safety and Health Considerations at the Planning and Design Stages of New Branches and Offices

Many managers working in banks or financial institutions have experienced difficulty arising from the need to retrofit fixed installations or modify the layout of existing premises in order to meet statutory requirements relating to occupational health and safety. Any modification or change will inevitably cause interruption to business and create nuisances (e.g. noise, dust, etc.) to both their clients and their staff.

Such problems may be avoided if management gives sufficient consideration to health, safety and environmental requirements before commencing their business in new premises. Such considerations are manifold and include the following:

6.6.1. Leasing and purchasing

Some premises, such as those with insufficient number of exits are inherently substandard for use as workplaces. Attempts made to upgrade the premises to meet required standards may incur costs and are not economically viable. During the leasing/purchasing of premises for use as new branches or offices, management should take steps to avoid hiring or purchasing such premises.

6.6.1.1. Mitigation measures

- It is advisable for management to develop a set of guidelines outlining prerequisite requirements, e.g. minimum number of exits, the required headroom and floor loading, etc., which must be met before entering into leasing or purchasing agreement with the landlord.

6.6.2. Internal layout and partitioning of the premises

Revision of branch or office layout in which business is already in operation is equally undesirable and often uneconomical. In designing the layout of premises and the usage of different sections thereof, due consideration should be given to the health, safety and environmental requirements as well.

6.6.2.1. Mitigation measures

- Noisy processes such as coin counting or phone banking should be located away from noise sensitive areas where work requiring high concentration is carried out.
- Noisy processes should be housed in a separate room or be adequately screened from the general working area.
- At the planning and design stage, management should also ensure that any partitioning will not inhibit means of escape or reduce the effective width of escape routes.

6.6.3. Procurement of equipment and machinery

When procuring new equipment and machinery for new branches and offices, management should, as far as practicable, order the types of equipment/machinery which have incorporated the necessary safety features.

6.6.3.1. Mitigation measures

- If the safety features are optional items, management should specify in their purchase orders to include such items. In many cases, accidents can be prevented and compliance can be achieved in a cost-effective way.
- Purchasing a paper shredder with a built-in guard is far more economical and effective in preventing accidents than modifying a machine that has not been equipped with a suitable guard in its design.
- Incorporating safety and health considerations at the planning and design stage of branches/offices is not only an effective way of securing compliance, but also a cost-saving measure.
- Management should consult their architects, engineers and safety professionals to ensure that safety requirements have been taken into consideration when expanding their business to new premises.

6.7. Occupational Safety Problems & Precautionary Measures

Mechanical hazards

6.7.1. The Vault

The vault is where valuables are kept. It offers tight security but at the same time poses a possible lock-in hazard to the bank employees.

6.7.1.1. Mitigation measures

- Setting up a strict entry / exit accounting system or making use of biometric check technology such as infra-red, heat detection systems are some feasible and effective means to prevent the lock-in hazard.

6.7.2. The Shredder

Shredders consist of revolving cutters located behind the machine casing. Without proper guarding, the operator's finger may slip through the feed opening and get hurt by the revolving cutter. Likewise loose clothing or long hair of an employee operating the machine can easily be dragged into the slot and entangled by the revolving cutter.

6.7.2.1. Mitigation measures

- The dangerous part should be effectively guarded
- Purchase only shredder machines incorporating a guarding mechanism

6.7.3. The file compacta

A file compacta poses trapping hazards to employees standing in between the moving cabinets of the compacta.

6.7.3.1. Mitigation measures

- An engineering control method as well as administrative control could eliminate the trapping hazard.

- Good engineering control includes a suitable locking system for moving cabinets or the drop-bars.
- The administrative control includes posting of warning tags at each cabinet to alert the workers outside the aisle to the possible presence of others inside.

6.7.4. Fire hazards

The common causes of fire are smoking, over-heating of electrical appliances and wiring. Combustible materials such as carpets and curtains commonly used in a bank can be easily ignited by burning cigarette ends or overheated electrical appliances and wiring.

6.7.4.1. Mitigation measures

- By adopting the sound policy of “Smoke-free Workplace”, both the fire and the health hazards in a bank or financial institution can be reduced.
- Thus, it is necessary to ensure proper connection and use of electrical appliances of sufficient capacity and correct rating to prevent electrical fires.
- For each electrical appliance, particularly for one with high rating capacity, there should be one independent socket outlet.
- Combustible material should be avoided or retrofitted -Fittings such as blinds should replace curtains and carpets should be replaced with floor tiles.

6.7.5. Exit arrangements

Management should arrange training and fire drills for their staff so that they are familiar with the evacuation procedures in case of a fire. They should be well aware of the location of all the exits and the emergency procedures.

6.7.5.1. Mitigation measures

- Sufficient fire-fighting equipment e.g. fire extinguishers, hose reels, etc. should be provided on each floor. They should never be obstructed
- The fire evacuation plans should be displayed at prominent locations on each floor together with illuminated exit signs and are very important to ensure safe evacuation in emergency situations.

6.7.6. Noise

Banking activities seldom give rise to noise levels that may seriously impair the employees' hearing. However, noise intrusion may affect concentration and efficiency. Noise may come from coin counting machines, banknote counting machines, printers and faxes. With proper engineering control, noise problems can be solved easily.

6.7.6.1. Mitigation measures

- Low noise emitting banknote counting machine should be utilised
- Buffer material can be mounted in the chute of a coin counting machine to reduce the contact noise arising from coin counting process.

6.7.7. Good housekeeping can prevent many accidents

Good housekeeping can eliminate tripping hazards such as wandering cable, folded or loose carpets.

6.7.7.1. Mitigation measures

- All cables to be encased in trunkings
- Carpets should be replaced with tiles and if not should be constantly inspected and replaced and glued back snugly when loose

6.8. Occupational Health Problems & Precautionary Measures

6.8.1. Teller workstations

An ergonomically designed workstation helps prevent fatigue and strain of tellers. Suitable workstations should be provided to tellers so that they can work comfortably and efficiently.

The management should also arrange for their employees suitable job rotation and rest breaks. In addition, tellers can reduce muscle fatigue by sitting and standing alternately while at work.

If the counters are designed too deep, tellers have to stretch their arms to receive items from customers. As a result, fatigue and strain may develop at the arm and shoulder. Deep counters also force tellers to adopt improper working postures. While working at such counters, tellers tend to lean forward in their seats leaving the back unsupported, or set their seats to an inappropriately low level causing undue strain to arms and shoulders.

Ultraviolet lamps are often used to check signatures or identify counterfeit notes. Prolonged exposure to ultraviolet light should be avoided.

A large number of staff in the banking and finance industry use laptops/computers for long periods every day. Poorly designed computer workstations, repetitive keying motion and static working postures can cause eye strain, muscle aches and general fatigue. Staff engaged in telephone banking, Forex dealing, programming and data input may be exposed to potential health problems caused by prolonged computer operation.

6.8.1.1. Mitigation measures

- Apart from having appropriate depth, a workstation which allows the teller to adopt a comfortable working posture should have adequate leg room, a firm foot rest and a suitable chair.
- The computer monitors used at counters should be placed in front of the tellers. The screen should be large enough to display characters of a size suitable for viewing.
- As good practice, ultraviolet lamps should be suitably shielded and placed far from the hand position. In checking signatures or notes, tellers should keep their hands at least 50 - 75 millimetres away from the centre of the lamp
- Assess the risks for those who normally work with computers for long periods and adopt control measures accordingly.
- Adequate desk surface should be provided.
- Sunlight reflection on the screen should be avoided by repositioning the monitor or by using blinds.
- Indirect lighting provided by up facing lights is a good way to prevent screen lighting reflection.

6.8.2. Manual handling operations

Employees may sustain injuries when performing risky manual handling operations like transporting heavy documents or coins. Some common injuries include strain and sprains to the arms, shoulders or back.

It is important to first assess the operational risks and then try to reduce them. Always consider the use of mechanical aids or team lifting to minimize risk and ensure that staff are properly trained beforehand.

6.8.2.1. Mitigation measures

- Mechanical aids, e.g. trolleys, should be used for transportation of large boxed of documents and which weighs more than 20kg.
- Heavy materials, e.g. coins, should be packed in small bags or packages to reduce the health risks associated with handling.
- If the operation is beyond one's capability, seek assistance from others.

6.9. Environmental Aspects

6.9.1. Meetings and Events

Organise a video/teleconference instead of travelling from different places to face-to-face meeting. It is easier, cheaper and more environmentally friendly and also saves time!

6.9.1.1. Mitigation measures

If a physical meeting is necessary:

- Organise the meeting at a place where the majority of the participants are based.
- Print to order the material for the meeting.
- Use double-sided printing and/or print two pages on each side. If printouts of presentations are needed, use 'Handouts' option with six slides on each page.
- Serve tap water instead of bottled water. It is cheaper, and reduces the amount of waste.

6.9.2. Electronic equipment

Electronic equipment such as note counters, laptops/computers, printers and shredders consume power when in standby modes and needs to be switched off to conserve energy and reduce emissions.

6.9.2.1. Mitigation measures

In the morning

- Switch your computer on first when you need it.
- Switch your individual or shared printer and copying machine on first when you actually need to use it.
- Use black screensaver which consumes less electricity than an animated screen saver.

During the day

- If you leave your office for more than an hour, save any open documents and put your computer on 'stand by' or 'hibernation' and switch off your individual printer.

At the end of the day

- Shut down your computer and turn off the printer and any other electronic equipment.

Heating and Cooling

- Adjust the thermostat, if you open a window.
- Close the office door, if you open a window
- Keep the window fully open for 5–15 minutes instead of just ajar for hours

Lights and lifts

- Use natural light wherever possible.
- Always switch off the lights in the office, bathrooms, kitchens and meeting rooms when leaving (for more than 15 minutes).
- Take the stairs instead of the lift. It saves electricity and keeps you fit.

Paper use

- Avoid printing e-mails and drafts (display documents on screen rather than printing out a paper copy)
- Archive electronically.
- E-mail documents as attachments. ... if you have to print:
- Make layouts that use as little paper as possible and provide a printer friendly version.
- Use the print option 'current page' and 'pages'.
- Check 'print preview' to avoid printing mistakes.
- Print on both sides of the paper in toner-saver mode
- Avoid printing on glossy paper and in colour (Note: never have a colour printer as your default printer).

Water

- Boil only the amount of water you need.
- Drink tap water (you can refrigerate it in a jar in the morning, if you want to have cold water available during the day).

Waste

- Deliver used batteries and toner cartridges to a recycling bin
- Put paper and other waste in separate waste bins
- Flatten cardboard boxes and put them in the paper waste bins/sacks.
- Deliver recyclable glass and plastic bottles to the recycling bin.
- Avoid using non-recyclable plastic bottles, cups, bags etc.

6.10. Training

On average, employees receive around an hour of safety-related training per year.

- All employees are required to complete mandatory online health and safety training which covers the key risks for all employees, including fire safety, display screen equipment, manual handling and slips, trips & falls.

Specialist training includes:

- Emergency training, including fire marshal and first aid training, is carried out in line with local legal requirements.
- Specialist health and safety training is carried in higher risk areas or for higher risk activities in areas such as our Cash and Coin Centres.

6.11. Medical options and health promotion

Working in a face paced and stressful environment takes its toll on employees. Given good labour relations and employment conditions employees should be offered the opportunity to belong to a medical aid scheme being funded from employer and employee contributions.

6.11.1. Mitigation measures

- Company medical aid and direct access to prestigious hospitals and medical facilities
- Ergonomics programmes
- Online training and classroom training courses in stress management
- Employee wellness events with a focus on health-related topics
- Influenza vaccinations
- Company sports events
- Medical benefits and emergency care for staff on business trips

7. REVIEW

The principles contained in this guidance will be reviewed on an annual basis to facilitate improvement.