Occupational Safety and Health Guidebook for the Banking and Finance Industry
Message from the Chairman of
The Hong Kong Association of Banks

I am delighted with the publication of this Guidebook which comes as a product of cooperation between the Labour Department and the Hong Kong Association of Banks. This Guidebook, which is tailor-made for the banking and finance industry, provides guidance for managers on the essentials of safety and health management in workplaces. It not only helps us to identify some of the potential hazards in our places of work, but also provides ways for planning and implementing effective in-house safety and health programmes.

With the enactment of the Occupational Safety and Health Ordinance and Regulation in 1997, banks and financial institutions, like other business sectors in Hong Kong, are statutorily required to provide a work environment that is safe to work in. This Guidebook offers advice to assist the industry in achieving compliance with these regulations.

Our industry is recognised around the world for its commitment to compliance and prudent management. These traits, I am sure, will also enable us to protect our workforce against occupational injuries and ill health. Some organizations in this industry have already taken great strides on this front and good practices they have developed may well serve as a benchmark for the entire industry.

In this regard, I wish to express my appreciation to these organizations in the industry for having so generously shared their experience with us. But most of all, on behalf of the Hong Kong Association of Banks, I must express my heartfelt thanks to Mrs. Pamela Tan, the Commissioner for Labour, for leading this initiative and her expert assistance, without which, this Guidebook would not have come to print.

Peter Wong
Chairman
Hong Kong Association of Banks
Message from Mrs Pamela Tan, JP,
Commissioner for Labour

It gives me great pleasure to introduce this Guidebook jointly published by the Hong Kong Association of Banks and the Labour Department.

The enactment of the Occupational Safety and Health Ordinance and Regulation in 1997 provides a unified regime for the control of safety and health of employees at work in both industrial and non-industrial sectors in Hong Kong. While the law lays down the legal framework, different industries may prepare guidelines for their own needs.

This Guidebook sets out the core components of a safety management system that will help the banking and finance industry to manage and control risks at work. It also suggests some precautionary measures to address the occupational safety and health problems in the industry. I am sure that the Guidebook will be of immense benefit to the management staff in developing and implementing their own hazard control programmes.

Finally, I wish to express my sincere gratitude to Mr Peter Wong, Chairman of the Hong Kong Association of Banks, for his strong support in making this Guidebook a reality, and to all those in the industry who have participated in the project.

Mrs Pamela Tan, JP
Commissioner for Labour
Acknowledgements

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- Bank of China Group
- HSBC Group
- Standard Chartered Bank
- The Hong Kong Association of Banks

They have kindly allowed us to visit their workplaces to visualize the real settings of banks and financial institutions; and shared with us their good practices in managing safety and health. We take this opportunity to express our sincere thanks to them for their contribution.
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Chapter 1 Introduction

Being one of the world's major financial centres, Hong Kong has 160,000 employees engaged in the banking and finance industry. Characteristically a risk administrator, this industry endeavours to build up capital gains and eliminate losses as much as possible. Employees are valuable assets. Injury at work and ill-health of an employee may lead to loss of working days, or business opportunity. Even worse, it may affect corporate image. A safe and healthy workplace can enhance employees' morale and improve productivity. In the long run, improving safety and health at work is a good investment with promising returns.

The objective of this Guidebook is to help managers in the banking and finance industry to identify potential hazards and suggest solutions to problems encountered in their workplaces. It also advises managers to implement a safety management system which would help discharge their general duties under the Occupational Safety and Health Ordinance. Chapter 2 explains what 'safety management' is.

It is important to ensure that safety and health considerations are integrated into the design and development of new branches or offices. This not only avoids the significant cost of retrofitting safety and health measures at a later stage, but also improves productivity. Chapter 3 provides a brief summary of the safety and health matters that should be taken into account at the stage of designing new branches or offices.

Although most of the employees in the industry work in a relatively stable environment, they are also exposed to some significant risk of bodily injury and ill-health. Common occupational safety and health problems that they may encounter in their daily work and corresponding precautionary measures are set out in Chapters 4 and 5.
Chapter 2  Safety Management System in the Banking and Finance Industry

What is a safety management system?

A safety management system (SMS) is the basis for ensuring the safety and health of employees at work. It means a system that provides safety management in an enterprise.

"Safety management" means the management functions of an enterprise related to the safety of its personnel, including -
(a) the planning, developing, organizing and implementing of a safety policy; and
(b) the measuring or auditing, and reviewing of the performance of those functions.
Why do we need a safety management system?

It is an effective way to 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. Under the Occupational Safety and Health Ordinance, an employer is required to ensure the safety and health of all his employees at work. To help the management comply with the statutory requirements in order to achieve higher safety and health standards at work, it is essential to put in place an efficient safety management system.

Elements in a safety management system

A safety management system basically consists of 14 core elements, which are listed in the Appendix. The elements considered most relevant to the banking and finance industry are briefly described hereunder:

1. **Safety policy**
   
   *A safety policy that states the commitment of the enterprise to safety and health at work.*

   A safety policy sets clear direction for the financial institution to move towards continuous improvement apart from complying with the law. It aims at maximizing the contribution of individuals through participation at all levels and to align safety and health objectives with business goals.
2. Safety organization

- A structure that assures the implementation of commitments to safety and health at work.

It is desirable to spell out the roles of respective staff members in occupational safety and health matters, with regard to their knowledge and responsibilities. Moreover, through the establishment of a Safety Committee, communication between the management and employees can be improved. The committee can also help to promote work safety in the organization.

Signing a Safety Charter would help pave the way for achieving safety as a shared responsibility between an employer and his employees.
3. Safety training
   
   *Training to equip the personnel with knowledge to work safely without risking their health.*

4. In-house safety rules
   
   *In-house safety rules to achieve safety management objectives.*

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.

Reference
   
   - Relevant legislation
   - Code of practice and guidance materials
   - International standards
   - Best trade practice and trade performance
5. Programme of inspections

A programme of inspections to identify hazardous conditions at suitable intervals and, where appropriate, take remedial measures.

A planned inspection programme is a form of active monitoring to identify hazardous conditions and where appropriate, take remedial measures.

6. Hazard analysis and control measures

Evaluation of job related hazards or potential hazards, and the subsequent development of control measures.

Hazard analysis provides a means to manage hazards in a way that eliminates or reduces them to an acceptable level. Where engineering control methods are not feasible, suitable personal protective equipment should be provided as a last resort.
7. **Emergency preparedness**

   *Being prepared for emergencies by developing, communicating and executing plans prescribing the effective management of emergency situations.*

A quick and correct response in case of emergency minimizes injuries, illness, property damage, environmental harm and public concern. 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.
8. Evaluation, selection and control of sub-contractors

Evaluation, selection and control of sub-contractors to ensure that they are fully aware of their safety obligations and are in fact meeting them.

For companies that have substantially contracted out its operations to sub-contractors, it is necessary to prepare guidelines for in-house personnel to evaluate, select and control their sub-contractors' performance. The safety and health performance of the sub-contractors should be an important criterion in selection.

Sub-contractors in a financial institution may include a contractor providing security services, a maintenance contractor, a cleaning contractor or a renovation work contractor.

Safety audit

Auditing is a mechanism for improving a safety management system. It helps a financial institution to reduce risks and ensure the continued effectiveness of the safety management system.

For further information on the safety management system and safety auditing, the reader may refer to "A Guide to Safety Management" published by the Labour Department.
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 safety and health. 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 safety and health requirements before commencing their business in new premises. Such considerations are manifold and include the following:

(i) **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. 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.

(ii) **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 safety and health requirements as well. 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.
(iii) 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. 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.
Chapter 4  Occupational Safety Problems & Precautionary Measures

Mechanical hazards

The vault

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

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. The dangerous part should be effectively guarded as shown below.
A **transparent** plastic sheet reduces the feed opening of the shredder to its minimum size.

**The file compacta**

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

- 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.
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. Thus, it is necessary to ensure proper connection and use of electrical appliances of sufficient capacity and correct rating to prevent electrical fires.

No smoking

By adopting the sound policy of “Smoke-free Workplace”, both the fire and the health hazards in a bank can be reduced.

Overloading of electrical appliances

Too many plugs connected to one socket outlet is a common cause of overloading leading to electrical fire.

For each electrical appliance, particularly for one with high rating capacity, there should be one independent socket outlet.
The 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. The fire evacuation plans displayed at prominent locations on each floor together with illuminated exit signs are very important to ensure safe evacuation in emergency situations.

Fire fighting equipment

Sufficient fire-fighting equipment e.g. fire extinguishers, hose reels, etc. should be provided on each floor. They should never be obstructed.
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, pin-writers and old model fax machines. With proper engineering control, noise problems can be solved easily.

The automatic banknote counting machine can be housed inside a separate room to contain the noise emitted by the pneumatic bank-note delivery system. Hearing protectors should be worn by the workers attending to the machine.

The walls of the room housing note-counting machines can be dressed with noise absorbing material to reduce reverberant noise.

Buffer material can be mounted in the chute of a coin counting machine to reduce the contact noise arising from coin counting process.
An acoustic booth can be used to isolate noisy equipment such as the above pin-writers and an old fax machine.
Good housekeeping can prevent many accidents

Good housekeeping can eliminate tripping hazards. The following pictures illustrate common causes of trip and fall at the workplaces:

**Wandering cable**

![Wandering cable](image1.jpg)

**Folded or loose carpet**

![Folded or loose carpet](image2.jpg)
Chapter 5  Occupational Health Problems & Precautionary Measures

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.

A deep counter requires the teller to overstretch his/her arm.

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.
A deep counter forces tellers to sit forward in the seat leaving the back unsupported, or set their seats to a low level.

A recommended teller workstation

- Arms kept close to the body
- Low back fully supported by the back rest
- Height adjustable counter chair
- Glass panel separating teller and customer
- Counter with appropriate depth
- Adequate clearance between the seat pan and counter for accommodating thighs
- Height adjustable foot rest

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.
Other equipment in teller workstations

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. Nowadays, LCD monitors have the advantage of producing large displays without occupying a great deal of counter space.

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

Use of computers

A large number of staff in the banking and finance industry use 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 phone banking, FX dealing, programming and data input may be exposed to potential health problems caused by prolonged computer operation.

Assess the risks for those who normally work with computers for long periods and adopt control measures accordingly.
The monitor should be placed directly in front of the user. 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.
A Comfortable viewing angle, e.g. 15° - 20°
B Comfortable viewing distance,
    e.g. 350 - 600mm for text of normal font size
C Forearm and arm at about right angle
D Adjustable back rest
E Adjustable seat height
F Firm foot rest if required
G Adequate knee clearance
H Wrist rest if required
I Screen at right angle to line of sight
J Adjustable document holder
K Wrist kept straight or at most slightly inclined
L Screen support adjustable for rotation and tilting
M Adjustable table height preferable
N Rounded or scrolled edge seat pad
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. Part VII of the Occupational Safety and Health Regulation sets out the principal requirements which management should follow to protect their employees from injury.

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. For further guidance on risk assessment and preventive measures, please refer to the Guidance Notes on Manual Handling Operations issued by the Labour Department in 1998.

A large box of documents weighs more than 20kg. Mechanical aids, e.g. trolleys, should be used for transportation.

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.
Chapter 6  Conclusion

This Guidebook has outlined a number of occupational safety and health problems commonly encountered in the banking and finance industry. The risks listed out here are by no means exhaustive. The main objective of this Guidebook is to take stock of the risks that exist in the industry and to raise management's awareness on safety and health issues in a working environment that is perceived as quite safe.

We hope this provides a starting point for management to conduct risk assessment and formulate appropriate control strategies to avert the risks in the workplace. This rationale is in line with Lord Roben's thoughts, which he advocated during the extensive review on the legislative framework concerning the safety and health at work in the early 1970s in U.K. We share his philosophy that whoever creates the risks has the primary responsibility to avert them.

On this premise, we have in Chapter 2 briefly introduced the concept and some core elements of a safety management system. The system has proven to be an effective tool that could help management manage safety and health in the workplace.

Bankers and others in the finance sector are proficient in managing financial and market risks. We trust that if they are committed to securing safety and health of their employees, they can manage the occupational risks in their workplaces equally well. As said earlier, 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.
Appendix

The 14 elements of a safety management system

1. A safety policy which states the commitment of the proprietor or contractor to safety and health at work.
2. A structure to assure the implementation of the commitment to safety and health at work.
3. Training to equip personnel with knowledge to work safely and without risk to health.
4. In-house safety rules to provide instruction for achieving safety management objectives.
5. A programme of inspection to identify hazardous conditions for rectification at regular intervals or as appropriate.
6. A programme to identify hazardous exposure or the risk of such exposure to the workers, and to provide suitable personal protective equipment as a last resort where engineering control methods are not feasible.
7. Investigation of accidents or incidents to find out the cause of any accident or incident and to develop prompt arrangements to prevent recurrence.
8. Emergency preparedness to develop, communicate and execute plans prescribing the effective management of emergency situations.
9. Evaluation, selection and control of sub-contractors to ensure they are fully aware of their safety obligations and are meeting them.
10. Safety committees to identify, recommend and keep under review measures to improve the safety and health at work.
11. Evaluation of job related hazards or potential hazards and development of safety procedures to address.
12. Promoting, developing and maintaining safety and health awareness in the workplace.
13. A programme for risk control and elimination of hazards before workers are exposed to any adverse work environment.
Reference materials

The following reference materials can be obtained from the Occupational Safety and Health Branch, Labour Department:

1. A Brief Guide to the Occupational Safety and Health Ordinance
2. A Brief Guide to the Occupational Safety and Health Regulation
5. Safe Systems of Work
7. Guidance Notes on Fire Safety at Workplaces
8. Five Steps to Risk Assessment
10. A Simple Guide to Health Risk Assessment (Office Environment Series) - Introduction & Housekeeping
18. Guidelines for Good Occupational Hygiene Practice in a Workplace
19. Occupational Health in Office Environment
20. Hints on First Aid
21. Five Steps to Information, Instruction and Training (Chinese version only)
Useful Information

If you wish to know more about this Guidebook or require advice on occupational safety and health matters, please contact the Occupational Safety and Health Branch through:

- Telephone : 2559 2297 (auto-recording after office hour)
- Fax : 2915 1410
- E-mail : laboureq@labour.gcn.gov.hk

Information on the services offered by the Labour Department and on major legislation is also available at our Home Page on the Internet (http://www.info.gov.hk/labour).

Information on safety training services can be obtained from:

- Occupational Safety and Health Training Centre,
  Labour Department
  Telephone: 2940 7057

- Occupational Safety and Health Council
  Telephone: 2739 9377