

Special Series on COVID-19

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Central Banks' "Return to the Workplace" Operational Considerations

Jihad Alwazir and Ashraf Khan¹

This note discusses the operational considerations associated with central banks' and monetary authorities' return to the workplace policies in the context of the COVID-19 virus. It stresses that virus risks will likely continue after the end of the lockdown and could potentially persist for a long period of time. Central banks will need to make adequate preparations prior to return to work under such an environment. This includes maintaining the existing flexible business continuity and risk mitigation arrangements, as well as raising the level of health and safety measures for an extended period of time.

CENTRAL BANK RISK MANAGEMENT AND BUSINESS CONTINUITY MANAGEMENT

Central banks have taken a range of monetary policy and financial stability measures to mitigate the impact of the COVID-19 crisis and maintain the flow of credit to their economies. The IMF COVID-19 Policy Tracker currently lists policies being undertaken in 193 economies. Enhanced transparency from the central bank would allow the central bank to adequately shape its accountability over such actions.²

At the same time, central banks have also been forced to examine the effects of COVID-19 for their own operations. As the previous IMF Note ³ stressed, numerous central banks have upgraded their own risk management and Business Continuity Management (BCM) measures, including enhanced Board involvement and reporting requirements, working from home/remote working arrangements, cross-training of staff, health and safety measures, improved IT infrastructure and cybersecurity, and specific measures in the area of cash currency management. The ability of central banks to implement these measures ensures continuity of critical

¹ For more information, country authorities may contact Jihad Alwazir (jalwazir@IMF.org), IMF Division Chief of the Central Bank Operations Division of the Monetary and Capital Markets Department (MCMCO).

² See, most notably, IMF. 2019. "Staff Proposal to Update the Monetary and Financial Policies Transparency Code." IMF Board Paper, April, Washington, DC.

³ https://www.imf.org/en/Publications/SPROLLs/covid19-special-notes

central bank functions, such as payments and information technology systems, the production of official statistics, monetary operations, and the provision of liquidity to the financial system, as well as policy-relevant financial market research.

RECOMMENDATIONS ON POST-COVID-19 MEASURES

Central banks should also prepare for *post*-COVID-19 central bank operations. The impact of the COVID-19 pandemic differs from one jurisdiction to another, and it is difficult to predict at this stage when a return to normalcy can take place. Nonetheless, central banks should plan and prepare for a post-COVID-19 lockdown stage where the virus risks are still prevalent and additional (operational) risk measures need to be taken. These measures need to be explored and coordinated with other relevant authorities, including in the areas of financial supervision, health, police, and other governmental entities. While the circumstances of each central bank are different, preparations should, to the extent possible, cover the following aspects:

• Health and Security Arrangements: A safe return to work will depend, among other factors, on the degree of COVID-19 testing, risk mitigation through social distancing, and tracing of domestic COVID-19 cases. Historical experience points to a non-negligible probability of two to three waves as per previous pandemics.⁴ Until an effective vaccine to the COVID-19 virus is developed or an effective prophylactic treatment is adopted, a return to business as usual in a no-vaccine environment may increase the risks of a resurgence of the virus.⁵
Central banks should strive to ensure staff operate in a safe environment with sufficient health and hygiene measures in place (see the IMF Note referred to in footnote 2). This could include additional sanitization of office spaces and high (public) contact areas, such as public information centers, cash currency areas, mail rooms, and so on. Health screening of staff prior to reentry may include serological/immunity testing where possible, once the accuracy and validity of such tests have improved. Limiting public access to central bank premises for a longer period should be considered. Central banks could also make use of the situation to enhance further digitalization of the workplace, in particular by limiting paper documents and archives, and continuing to facilitate internal and external meetings via video- or teleconference.

Central banks will also need to enforce continued social distancing (for social distancing to be effective, it should be fully embedded in the work processes and organization) and protective work-health protocols within central bank premises and branches and encourage staff to maintain social distancing in general outside of the work environment as well. Similarly, travel and meeting policies will likely need to be reexamined. The central bank's crisis management team may consider deploying health screening (such as temperature monitoring) at the entrance to the premises that may assist in detecting staff with early symptoms. Testing may be arranged but should not, however, be considered a panacea given reliability concerns and a still-evolving understanding and effectiveness of screening, detection, and antibody-mediated immunity. The primary focus of the crisis management team should be to implement health and hygiene protocols to address potential level(s) of risk in branches and cash

⁴ Saunders-Hastings, P. R., and D. Krewski. 2016. "Reviewing the History of Pandemic Influenza: Understanding Patterns of Emergence and Transmission." *Pathogens* 5 (4): 66. Published December 6, 2016 doi:10.3390/pathogens5040066. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5198166/citedby/

World Health Organization. 2020. "Considerations in Adjusting Public Health and Social Measures in the Context of COVID-19." Geneva. (https://apps.who.int/iris/ bitstream/handle/10665/331773/WHO-2019-nCoVAdjusting_PH_measures-2020.1-eng.pdf, accessed 24 April 2020)

centers. This might include looking at sources of potential exposure (where, how, and to what sources might staff be exposed to). When possible and available, relevant data should be used in doing so (varying from geolocation, contact tracing, and health information linked to COVID-19).

• Central banks should maintain enhanced health and hygiene protocols arranging for full sanitization of premises prior to return to offices. Sanitization should be performed on a regular schedule and inbetween team shift changes cleaning and disinfecting all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, elevators, and doorknobs. Measures should also consider improving the engineering controls using the building ventilation system to increase ventilation rates and percentage of outdoor air that circulates into the system. Ideally, the BCM team would recommend an in-house medical infirmary with qualified medical staff who can test and monitor staff on the premises and provide medical advice and health information materials. Medical staff could organize health webinars or seminars. Management should continue to communicate the importance of health measures, such as social distancing of 2-meters (6 feet) on and off central bank premises, frequent and thorough hand washing, and, where possible, the central bank could continue to provide hand sanitizers and distribute gloves and masks to staff on premises.

A reexamination of offices spaces should be considered. This includes revisions to policies and guidelines for open workspaces and meeting room capacities, as well as other informal meeting areas in the central bank. The BCM team should also ensure the provision of health informational materials.

The central bank's HR team (ideally as part of the crisis management team) should communicate information and provide mental health support option for staff during the crisis. Many staff are carrying a heavy burden—increasing work demands, helping children with schoolwork, and caring for family members. To help them navigate these unprecedented times, it is important to provide staff with psychosocial support and guidance during this global health crisis. The impact of a pandemic can include a rise in anxiety among staff, in particular when provided information is inadequate or even incorrect. Communicating health-related information and providing mental health support for their staff is essential, as is educating managers accordingly, and making services available for those affected.

- Working Arrangements: The return to the workplace should be carefully planned, flexible, focused on necessary on-site critical functions (or functions with a high-risk increase when conducted remotely), gradual, and phased over a long period of time. Building on successful working from home arrangements could allow central banks to continue a higher rate of staff working remotely for a prolonged period. This would hold especially for staff in policy and research areas. Staff in critical functions (such as security, payments system-related, cash currency production and management, on site supervision, and market operations) whose physical presence is necessary, could be considered among the first staff to be allowed a gradual return to office, though this would also require an assessment of means of traveling to the office (such as an overly strong dependence on public transportation arrangements). This would also imply that central banks examine the viability of existing remote work policies, given that many of these arrangements were not meant for large-scale remote work and the existing arrangements for physical office space and access to offices.
- Depending on the level of virus exposure in the community, central banks could utilize a combination
 of work zone-based policies dividing staff into groups ("zones") along the lines of their perspective

⁶ Centers for Disease Control and Prevention. 2019. "Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)." Atlanta. https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

departments or divisions (or based on common work area of different work groups). Such an arrangement allows for social interaction within a zone while limiting the interaction with other zones (or groups) in the central bank. Establishing different group work schedules (such as one week on/week off work shift schedule for the critical staff) would likely also reduce the business continuity impact of staff infection.

- Remote working arrangements should take individual risk factors and family care circumstances into consideration, subject to labor and equal opportunity regulations. Examples of such circumstances include older age, the presence of chronic medical conditions, including immunocompromising conditions, pregnancy, children participating in remote school programs, or elderly or dependent relatives requiring family assistance. Central bank management should communicate and acknowledge the personal and professional challenges that staff and their families experience during a crisis.
- Risk Governance and BCM: A gradual return to the workplace will be an opportunity to reinvigorate the business continuity processes and review, internalize, and communicate lessons learned from the crisis to all departments. It is also an opportunity to reprioritize and address any shortcomings encountered in BCM execution, including reinforcing staff resources to continue working from home/working remotely (through coordination with third-party service providers). Central banks could examine the reorganizing of teams to foster knowledge transfer between experienced and less-experienced staff in case key personnel in mission-critical functions are incapacitated due to the virus. Central banks should also follow up on the training (including remotely) of additional staff to do critical functions and use succession planning including staff from different departments with prior experience in the critical function. Vendor services and functions should also be carefully documented, to assure that single points of failure do not exist within key external resources.
- Central banks should assume and prepare for the possibility of a subsequent COVID-19 resurgence scenario and a second shutdown and continue to operate under the business continuity framework. It should be also important to reassess the central bank's key risks (operational, financial, reputation, strategic) using, for instance, an agile approach, to ensure that these risks continue to be mitigated in the context of post-containment working environment. Any COVID-19-related risk incidents (and deployed risk mitigation measures) should be examined closely, and follow-up should ensure that recurrence is prevented. Closer cooperation and coordination between all levels of the organization (including business departments, risk management, and internal audit) is of paramount importance. See the IMF Note referred to in footnote 2.
- Any changes to the central bank's governance and decision-making arrangements should be properly managed and logged. Given the rapid onset of COVID-19, regular governance and decision-making arrangements within the central bank may have been (temporarily) changed or even suspended. It is critical that such changes are properly recorded, including any arrangements for the BCM team to remain in charge of the monitoring of, and reporting on, COVID-19-related issues. This will ensure that possible legal risks can be assessed, review by internal and external auditors can take such temporary changes into account and reversing any such changes can be done in an effective manner at the appropriate time.
- A reassessment of the central bank's key strategic priorities should also be considered, taking into consideration the environment induced by the crisis and the lessons learnt at this stage.
- IT Infrastructure and Cybersecurity: A holistic approach to IT and cybersecurity management is critical to reducing technology, people, and physical vulnerabilities. Under the current crisis environment, technology and people risks are elevated due to more staff working remotely for longer periods of time. Central banks need to increase vigilance and continuously assess if their existing IT infrastructure is sufficient, both from a capacity point of view, and to ensure the highest standards of cybersecurity are met. This applies to the use

of (personal) hardware, additional software (varying from video-conferencing software, to applications for access to central bank resources, and tailor-made IT solutions), as well as the involvement of, and dependency on, third-party vendors (such as cloud computing providers). Central banks should also consider tracking real-time crisis metrics more clearly, including IT system usage and outages, IT Help Desk inquiries, COVID-19 infection rates, sick leave statistics, and work performance indicators. These could serve as useful gauges and allow for adjustments to response strategies throughout the crisis. See also the earlier referred to IMF note (footnote 3).

In line with IMF recommendations on cybersecurity aspects of financial institutions, the following recommendations to central banks hold for the current crisis as well as for the post-COVID-19 scenarios:

- Adopt and implement good practices of international technical standards applicable for secure remote working. Central banks that have not implemented such standards are encouraged to utilize the current crisis to adopt a standard such as the COBIT 2019 or the ISO 27000 series, or the NIST 800-46 Rev 2 or BSI IT-Grundschutz-Catalogues which contain numerous suggestions for technical protection as well as organizational measures.
- Implement robust controls over configurations at both ends of the remote connection to prevent potential malicious use
- Implement additional security controls for critical functions that are normally not allowed to work remotely
- o Only activate remote access services and user profiles when required
- o Launch additional awareness campaigns on cybersecurity for all employees.
- Internal and External Communication: Internal and external communication is essential to ensure expectations are managed, and a smooth transition to a post-COVID-19 situation is established. Central banks should maintain flexibility, transparency, and clear communication, as well as a continued information flow between central bank crisis management team and all internal and external stakeholders. Ensuring that any COVID-19-related news (fake or not) is dealt with adequately and clearly by the central bank, should be a priority. The central bank should also ensure that any communication is proportional and tailor-made, wherever possible, to avoid an "overkill" of information for staff and external stakeholders.
- Cash Currency Management: In line with the recommendations above, post-COVID-19 measures for cash currency management should likely include further enhanced health safety and security measures for staff working with cash or in cash centers (such as regular screening, increased sanitization, working in shifts); clear public communication on cash currency and alternative means of (electronic) payment (including relaying messages from the World Health Organization, and in close cooperation and coordination with domestic financial institutions and other domestic authorities); as well as specific cash measures, such as continued quarantining of bank notes, if and where need be.

In summary, although it is still uncertain when the COVID-19 pandemic will be over, the similar uncertainty of what such a post-COVID-19 environment would entail should incentivize central banks to plan ahead in a timely and efficient manner. Learning lessons from their current modes of operating and from best practices emerging in the central banking community, will allow central banks and their staff to not only counter any remaining adverse effects of the COVID-19 crisis, but also come out of it stronger, with dedicated staff, and an even more-resilient organization.