CDC
Investment works

Guidance

Returning to the workplace during COVID-19: Labour and workforce considerations

Acknowledgement

Disclaimer

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Scope and purpose

Governments around the world are easing strict lockdown measures introduced to limit the transmission of COVID-19 and which led to the full or partial suspension of many business activities and workplaces. Importantly, this does not signal a return to 'business as usual' for most companies, but rather a transition to a new way of doing business in order to confront a set of previously unencountered challenges. This includes ensuring workers (and clients) are safe in newly re-opened workplaces, as well as responding to new economic conditions and ongoing uncertainty about the trajectory and consequences of the COVID-19 outbreak.

This interim guidance note offers assistance to employers on how to anticipate and manage labour-related issues where operations are resuming – in part or in full – after lockdowns, particularly where a return to pre-COVID-19 work locations is involved. This includes analysis of:

– **Contextual factors influencing a return to work during the COVID-19 outbreak**, particularly easing of restrictions, easing of temporary relief schemes, and employment and occupational health and safety laws.

– **Return to work planning and approaches** including assessing workforce implications, engaging and communicating with workers, revising Human Resources (HR) policies, recalling workers, and transitioning the workforce.

– **Sector-specific challenges and potential responses** in manufacturing; infrastructure construction and real estate; financial services; retail/business to consumer (B2C) services; agribusiness; and healthcare.

This note primarily focuses on workforce management considerations and does not seek to provide specific guidance on occupational health and safety (OHS) measures. OHS considerations for return to work are covered in a separate CDC note, Returning to the workplace during COVID-19: Occuptional health and safety considerations.

02

Returning to work in a COVID-19 context

Returning to work involves a different set of challenges for each individual employer, conditional on national easing and policy measures, as well as broader financial and economic factors. The following factors will play a significant role in determining how companies plan the return to work and the potential workforce implications:

– Easing lockdowns and other restrictions. National and local laws restricting certain business activities are one of the most important determinants of whether companies can restart operations. Other restrictions, such as curfews or social distancing measures, will determine if workers can physically return to work and whether – or how – they can do so safely. Although restrictions on movement are gradually being relaxed within borders, strict cross-border movement restrictions are likely to persist, which may pose a challenge for companies relying on international migrant workers.

– Easing or withdrawal of temporary relief schemes. Governments across the world have responded to COVID-19 with a range of support measures for individuals and businesses, including tax exemptions, income support programmes, and debt repayment deferrals. Returning to work may rely on the form and availability of ongoing support, and companies should understand and monitor these programmes, particularly where they are time-bound.

– Employment and OHS laws. Employment and OHS legislation should be carefully analysed to determine how it will affect the parameters of a return to work. Health and safety considerations should extend beyond the immediate workplace to include employer-provided accommodation and travel to and from work. National laws may permit workers to refuse unsafe work, require employee consent for unpaid leave, or impose procedural requirements on modifications to employment contracts. Some jurisdictions have implemented COVID-19-specific legislation (for instance, prohibiting COVID-19-related dismissals).

03

Return to work: planning and approaches

This section provides a range of considerations for companies where work resumption is planned or underway. The decision framework provides a step-by-step overview of major considerations that companies need to take into account in return to work planning, with additional clarifications in the sections that follow.

Across all stages of the decision-making process, a successful return to work will require close involvement of the HR function, commitment from senior management, and strong communication with the workforce. HR teams can update and adapt policies in light of changing circumstances, communicate changes with workers, address worker welfare or morale issues, and keep abreast of relevant legal developments. The input of HR is also vital for medium-term strategic business planning, particularly for skills planning and development. Ensuring that HR has adequate capacity and support is therefore crucial. Senior management should also engage closely with HR teams to understand ongoing challenges related to the return to work, including the outcomes of ongoing communication with workers.

Considerations for small and medium-sized enterprises (SMEs)

When planning a return to work, SMEs may face constraints due to their size, HR capacity, or financial position. Even so, the overall planning framework is relevant to companies of all sizes and many of the considerations in this note can be achieved at little or no cost. Effective measures for SMEs include reorganising work on the basis of a risk assessment, regularly engaging and communicating with workers, and revising key HR policies and procedures to adjust to COVID-19 challenges.

Other measures, such as using new technologies to communicate with workers, or maintaining incomes for those who cannot return to work immediately (including vulnerable workers), may require more resources. This can be an opportunity to collaborate with business peers, local government, industry bodies, or supply chain partners. There may also be scoping to discuss financial and technical support (TA) with investors.

Return to work: a planning framework for employers

Understand the scope of lockdown easing. Do national public health measures make it possible to resume on-site (workplace) operations? *(See section 3.1 below)*

NO

Continue remote working where practical, employee support and engagement, training, livelihoods support where feasible. Consider active communications and outreach needs

YES

Conduct workplace risk assessment *(See section 3.2 below)*

Are there specific areas or activities which require attention: customer-facing activities, worker accommodation, travel to and from work?

Are there certain workers whose health profile or personal circumstances (e.g. caring responsibilities) prevent them from returning to work?

What are the implications of C19-secure work arrangements for employment terms – short hours, reduced shifts, part-time or new recruitment? *(See section 3.3 below)*

Develop C19-specific workplace HR/OHS/ operational policies and procedures, including training, discipline, and grievance to support safe working practices, and ensure employee agreement to any modifications in line with national law, with regular review points *(See section 3.5 below)*

Where only partial restart of operations is safe and viable, develop non-discriminatory criteria for assignment of staff, informed by health risk and economic vulnerability *(See section 3.6 below)*

Have amendments been made to national law which may pose a risk to good HR or OHS practice – eg extending working hours? Decide policy in view of PS2 commitments and responsible business practice

Do workers require assistance with travel and/or accommodation - for instance where public transport is unsafe or if travel restrictions are still in place?

Engage/communicate with workforce – are they willing and able to return to work? What do they need to know? What additional support might they need? *(See section 3.4 below)*

Has there been engagement with vulnerable workers to understand their particular needs? E.g. do women face challenges when education and childcare facilities are closed? What support can be provided?

Develop and implement ongoing workforce comms strategy for all workforce – on-site and off-site

Where initial operations are not at full capacity, develop roadmap to transition workforce to new scale and form of operations *(See section 3.7 below)*

Integrate workforce consideration into broader resilience and continuity planning: what skills will the future workforce require? What planning is necessary to prepare for potential further wave(s) of lockdown?

Where retrenchment is unavoidable, communicate intentions to investors and develop plan for workforce consultation around measures to minimise impacts

3.1 Understanding the nature and scope of lockdown easing

The nature and scope of government policy on easing COVID-19-related restrictions and lockdowns will vary between countries. Companies need to ensure they have a firm understanding of the measures that apply to all of their workplaces and business activities in order to adopt a safe and lawful approach to recommencing work.

Some companies may continue with remote working arrangements if movement restrictions remain in place, or may wish to maintain a remote workforce after lockdowns are lifted (see CDC Guidance on managing a remote workforce during the COVID-19 pandemic 2020). In some cases, only a partial return to work will be possible, requiring companies to recall certain workers and perhaps consider further support for those who cannot return immediately (see Section 3.6). Easing of restrictions may also allow for a full return to work, however, companies may wish to engage in workforce planning that strengthens business resilience or transitions the workforce to new forms or scale of operation, possibly taking advantage of new methods of flexibility and productivity discovered during lockdown (see Section 3.7).

3.2 Conducting a workplace risk assessment

Ensuring a healthy and safe working environment is paramount. In order to minimise COVID-19 transmission risk, employers must consider what measures are appropriate at a workplace or work location, as well as in employer-provided accommodation or transport. COVID-19-related health and safety responses should be applied to all workers, including contractors. For technical advice on the OHS elements of workplace risk assessments and implementing OHS measures see CDC's guidance on Returning to the workplace during COVID-19: Occuptional health and safety considerations.

Broad questions for employers to consider when conducting a workplace risk assessment include:

– Are there specific areas or activities which require attention: customer-facing activities, worker accommodation, the contracted or informal workforce?

– Are there certain workers whose health profile or caring responsibilities prevent them from safely returning to work?

– What are the implications of COVID-19-secure work arrangements for employment terms (e.g. short hours, reduced shifts, part-time or new recruitment)?

– What kind of risks do workers face in commuting or travelling to work?

– What systems are in place to ensure changes to working arrangements are clearly communicated to third-party workers?

– Are there new or emerging security concerns raised by the COVID-19 outbreak; for instance, community tensions or increases in crime associated with reduced incomes in the area around the workplace?

Some of these challenges are analysed in Section 4: Sector-specific considerations.

3.3 Addressing potential workforce implications of COVID-secure workplace arrangements

Workplace risk assessments and OHS responses to COVID-19 can have significant workforce implications. Policies and procedures may have to be revised and the workplace itself may have to be reorganised. Health and safety measures may change how work is organised, with follow-on effects for terms and conditions of employment, including:

– Reducing the number of shifts or introducing part-time working or job-sharing in order to achieve social distancing – resulting in reduced weekly working hours and reduced wages;

– Shortened working days or changes to standard working hours to achieve workplace social distancing and reduce peak-time pressure on public transport;

– Maintaining full or partial remote working arrangements for employees where possible;

– Change to physical workplace or change of physical work location;

– Changes to employer-provided food, accommodation, childcare or other amenities; and

– Changes to agreed arrangements on paid leave, including employer requests to take leave at specified points in order to maintain continuity of staffing.

Whatever measures are taken, it is necessary to ensure open and ongoing communication with affected workers as well as compliance with national law. Changes in terms and conditions of employment will likely require employee agreement under national law. If terms and conditions of employment are negotiated under a collective agreement, engagement with unions and re-negotiation may be necessary. Where possible, companies should obtain legal advice in order to ensure compliance.

Changes to terms and conditions of employment should be accompanied with a clear and transparent process for reviewing modifications and deciding when and how to revert to 'normal'. This process should be communicated with workers, and ideally should involve worker consultation and input (for further details, see Section 3.4).

Special consideration should be given to the presence of vulnerable workers in the workforce, as the vulnerability of certain groups of workers may be compounded in the coming months. This includes the implications of ongoing economic uncertainty and health risks for migrant workers, women (including heightened risk of gender-based violence and harassment (GBVH)), workers with care responsibilities, older workers, pregnant workers and workers with health conditions. Companies can begin by identifying the needs and vulnerabilities of workers, ideally through a process of engagement and consultation (see Section 3.4 below), and collaboratively developing appropriate responses. Exploration of some sector specific approaches can be found in Section 4.

3.4   Engaging and communicating with workers

Regular and transparent communication with workers can serve a number of important functions, including:

– Conveying information about COVID-19-related measures, particularly safety measures and measures which have a material impact on terms and conditions, in order to promote understanding and minimise confusion;

– Providing training on work resumption measures, particularly OHS procedures and new policies;

– Assessing workforce morale and offering reassurance during difficult and uncertain circumstances;

– Establishing availability to resume work, where workers have been inactive and potentially obliged to find alternative income sources;

– Understanding workers' concerns and perspectives on personal concerns; for instance, in relation to safety, transportation, childcare, and accommodation, including identifying the impacts of work resumption approaches on vulnerable groups (e.g. impact of withdrawing childcare facilities on women workers); and

– Providing accurate information about COVID-19 in order to counteract health misinformation and to minimise stigma against members of the workforce who might fall ill.

Companies may wish to develop a COVID-19 communications strategy for optimising workforce engagement, particularly where obtaining consent is necessary for contractual modifications (see Section 2 above), consultation with trade unions is required, or to understand the needs of vulnerable workers. The details of a communication strategy will be context-specific, but should specify the purpose of any communication effort, audience, and the best methods of communication which are accessible and understandable to the workforce. Online surveys, app-based communication or other technology may make it easier to communicate with a dispersed workforce, including workers engaged by third parties. Overall, information gathering and consultation should be viewed as an ongoing process instead of a single event.

3.5   Reviewing and updating HR policies in the context of COVID-19

Employers may want to revisit and update key HR policies and procedures to ensure they are adequately equipped to deal with COVID-related changes in working arrangements and legal requirements. Beyond implementing specific return to work measures, such as changes in shifts or workforce redeployment, HR planning can also address broader (and perhaps less obvious) policy considerations including:

– **Data protection and confidentiality:** There should be clear policies in place to guide any medical testing for COVID-19 and collection of health information. Methods of information collection (including apps) should ensure that the confidentiality and security of employee health data are maintained and that there are strict controls in place to protect employee privacy (e.g. tests are carried out by independent medical professionals and results held by third parties). Policies should clearly state the limits of what information can be collected (in line with national law where applicable), specify the use of personal information, specify who can access information, and the ways in which information will be stored and secured.

– **Grievance mechanisms:** Grievance mechanisms provide a crucial channel for workers to raise concerns about working conditions and should be viewed as an integral component of a company's overall worker engagement strategy. As a result, they should be carefully re-examined to ensure that workers can safely and readily raise grievances and management is positioned to respond quickly to concerns. Given the scale of the disruption to workplace arrangements, and the degree of ongoing uncertainty, some companies may choose to introduce a dedicated COVID-19 grievance mechanism for workers. Companies should anticipate new kinds – and potentially an increased volume – of grievances related to returning to work. For example, workers may have concerns about unsafe working conditions, tensions may rise due to operational difficulties posed by new safety measures, or workers may wish to contest modifications to terms and conditions of employment and partial returns to work. Grievance mechanisms should also be reviewed to ensure there is adequate access for those who continue to work remotely, and may be strengthened by introducing new technology (e.g. replacing suggestion boxes with an online portal for lodging anonymous grievances).

– **Disciplinary processes:** To ensure a safe return to work, companies will be introducing new COVID-19-related policies and procedures which may involve disciplinary consequences for associated breaches. New safety requirements – and consequences for their breach – must be clearly communicated to the workforce as part of the return to work, alongside the rationale for their introduction. In some cases, disciplinary measures may be necessary, for example if there is an ongoing failure to respect basic social distancing or use personal protective equipment (PPE). It is important to ensure new disciplinary procedures and penalties can account for an individual's personal circumstances, are not applied arbitrarily or unfairly, and include a right to appeal. Additionally, a period of adjustment may be necessary for workers to become accustomed to new working arrangements. Relevant laws, such as the right to refuse unsafe work, may also define which disciplinary responses are permissible.

– **Leave policies:** The reality of COVID-19 places additional weight on the significance of workplace policies on sick leave and caring leave. An important element in minimising workplace transmission risk is that workers who are infected or experiencing symptoms do not present at the workplace; eligibility to adequate sick pay plays an important role in this. At a minimum, companies must be up-to-date with applicable statutory requirements, collectively-agreed provisions and practice among sector peers on paid sick leave and paid care leave as they apply to workers with (suspected) COVID-19 or caring responsibilities as a result of COVID-19 and public health measures. Where national law does not provide for sick or care leave, it may be possible to introduce forms of sick leave or care leave through the development of new policies in consultation with the workforce. Companies may also be able to provide other forms of support, such as extending health insurance coverage. This might involve providing private insurance coverage to currently employed workers or extending coverage to furloughed workers.

3.6 Recalling workers where only a partial return to work is possible

In some cases, only a partial return to work may be practical, due to health and safety measures or due to reduced labour requirements. In circumstances where only a proportion of the workforce is recalled, companies should develop a clear plan for selecting workers that complies with national law, is based on consultation to the extent possible during lockdown (including with local authorities if required), and aligns with non-discrimination principles. Return to work planning should allow for flexibility and should seek to understand individual circumstances, for instance to accommodate and support workers who are unable or who do not wish to return immediately. When developing an approach to recalling workers, consideration can be given to the following:

– **The recall plan should be developed in consultation with workers**, for instance through existing representatives or committees, in order to ensure that a range of perspectives are captured and to strengthen worker buy-in overall. Any plan should set out clear procedures for addressing the situation of workers who are unable or do not wish to return to work. If workers do not wish to return due to safety concerns, relevant laws on the right to refuse unsafe work should be followed and safety concerns addressed if necessary. Flexible approaches should be explored in recognition of the difficult individual circumstances created by COVID-19 (e.g. specific health vulnerabilities or additional care responsibilities), and grievance mechanisms should be available (see below).

– **The criteria for deciding the order in which workers are recalled should be specified and disclosed**. As discussed above, criteria should be non-discriminatory and as objective as possible. This may include consideration of relevant skills, seniority, number of dependants, or made subject to medical clearance (where medical clearance criteria are objective and non-discriminatory). To the extent possible, workers and their representatives should be consulted on the development of criteria, and ensure that the voices of women, older workers, disabled, migrant workers and other underrepresented or vulnerable groups are included in the process. In order to encourage transparency, a 'recall order' list can be published and may be subject to grievance mechanisms (see below).

– **Grievance mechanisms should allow workers to raise grievances in relation to the recall process**. For instance, this might involve challenging the recall criteria or the manner in which the criteria are applied. Such disputes should be resolved quickly and transparently, and special grievance mechanisms might be developed to respond to such complaints (see Section 3.5 above).

– **A regular review process should assess workforce requirements**. This would ensure operational needs are being met by existing workforce numbers and determine if further recalls are possible. A review process can also assess the effectiveness of company communication and grievance mechanisms, and gauge employees' experience of return to work arrangements to help make improvements.

> ## Maintaining support for workers who cannot return immediately
>
> Companies may be considering forms of support – particularly livelihood support – for workers who cannot return to work immediately. This might involve using combinations of paid and unpaid leave, allowing workers to use employer-provided facilities if safe (e.g. health clinics, canteens, worker accommodation, childcare facilities), extending private insurance coverage, or providing small subsistence payments.
>
> Measures to retain workers on the books with partial income or other supports are explored in CDC, COVID-19 Guidance for investors and financial institutions on job protection (2020) as well as IFC, Interim advice for IFC clients on supporting workers in the context of COVID-19 (2020).

3.7 Transitioning the workforce to COVID-secure, resilient business operations

Given the unpredictable trajectory of COVID-19, including the potential for recurring lockdowns and restrictions, companies may explore how to transition the workforce to new scale and forms of operations. This can involve the following considerations:

– Internalising lessons learned from COVID-19, including formalising new forms of working (e.g. flexible and remote working) and improving methods of worker-management dialogue and communications, including strengthening initiatives to support worker mental health (see: CDC, Guidance on managing a remote workforce during the COVID-19 pandemic (2020)).

– Exploring likely changes in the volume or demand of business partners (including contractors and supply chains). This might be accompanied by workforce training in order to develop internal capacity and create a more flexible and agile workforce that is better positioned to respond to rapid change.

– Developing some of the plans and processes discussed throughout this guidance note at an early stage, even if not necessary immediately. This includes processes for modifying and reviewing changes to terms and conditions of employment, emergency communication strategies, COVID-19-specific HR procedures, or recall criteria. Early planning can allow for greater consideration and consultation. Companies should also consider establishing protocols to ensure work can continue in a COVID-19-specific emergency, for instance monitoring and maintaining supply of PPE and sanitation products.

– Identifying and implementing positive changes to working practices borne out of crisis-response necessity, focusing processes and practices which spur innovation and inclusion. For example, how has COVID-19 forced us to re-think what we do and how, and which old habits should we leave behind?

– Building networks and collaborating with existing businesses. This might involve informal or formal support networks which can share resilience planning experiences, HR advice, and timely information on risk information and legal developments.

– Developing approaches to responsible retrenchment, in consultation with investors, which seek first and foremost to minimise impacts on workers, where the business and economic impacts of COVID-19 make restructuring unavoidable.

As employers respond to the short and medium term consequences of COVID-19 , there may also be opportunities to introduce changes based on a longer-term perspective, allying business and employment priorities by seeking to become an employer of choice in the 'new normal'. This could involve:

– taking a longer-term approach to workforce upskilling and recruitment, offering workers sufficient opportunity and security so as to realise returns on investment in skills development;

– strengthening worker engagement and communications strategies on the basis of lessons learned during the pandemic;

– ensuring that equal opportunity in the talent pipeline is integrated into longer-term human capital development; and

– where the nature of operations allows, re-thinking working arrangements which correspond to staff priorities and responsibilities identified through ongoing engagement, transitioning to remote or flexible working for some functions.

04

Sector-specific considerations

This section explores some of the specific challenges – and potential responses – for employers managing a return to work in the following sectors: infrastructure, construction and real estate, agribusiness, financial services, manufacturing, retail/business to consumer (B2C) services and healthcare.

Many of the responses identify adaptations and measures to create a safe workplace, and to ensure workers are informed and engaged, and feel adequately involved, protected and empowered in these new arrangements. For specific guidance on OHS responses, refer to CDC's guidance on Returning to the workplace during COVID-19: Occuptional health and safety considerations.

In developing responses to potential COVID-19 challenges, companies should also consider ways to extend their measures beyond the direct workforce. Companies may wish to communicate with third parties to ensure that third party management systems are sufficiently robust. Where gaps are identified, companies may need to introduce new measures to train, support and monitor the performance of contractors and sub-contractors (particularly in relation to vulnerable workers who may be subject to health and other workplace risks such as GBVH and forced labour). Key obligations should be cascaded down the sub-contracting chain, particularly information and actions aimed at controlling the spread of infection. This is particularly true for companies applying IFC's Performance Standard (PS) 2, which states companies should ascertain that third parties have in place an environmental and social management system (ESMS) that allows for operation consistent with PS2 (with the exception of PS2 provisions on retrenchment and supply chains).

4.1   Infrastructure, construction and real estate

Sector characteristics	Potential challenges	Potential responses
Lockdowns may have led to significant delays in infrastructure projects and *force majeure* may have been called.	After significant delays on a project, there may be increased pressure on working hours and potential for excessive overtime. Contractors may be keen to make up for delays during the lockdown, but workers may also be willing to work longer hours to make up for lost wages. Project delays also bring increased risks of incomplete or non-payment of wages, or non-payment of overtime premiums and wage arrears.	Ensure robust systems are in place for monitoring working hours, overtime, wage payments and other aspects of labour, as well as ongoing onsite compliance with OHS legislation. This should also include an assessment of contractor's management systems (see also below). Safety principles should still be paramount, even where national laws on working hours have been relaxed as a government response to COVID-19.
There is a high reliance on (sub) contractors for both service and labour provision.	Workforce visibility is difficult where there are large numbers of sub-contractors. Also, the transient and changing nature of construction sites means the use of subcontractors (and the composition of the workforce) is subject to ongoing change. This can make it harder to communicate consistently with workers, and to roll-out training on new site procedures, including any adjustments to working hours, grievances and disciplinary procedures. Due to limited HR capacity, smaller contractors may face particular challenges when communicating changes to working arrangements, providing training and managing grievances to workers.	Review systems for coordinating and communicating with contractors and sub-contractors on working arrangements. Ensure closer coordination with (sub)contractors to develop a greater understanding of C-19 response plans and operational procedures, and to ensure that new measures are communicated to workers through sub-contracting chains. Use this as an opportunity to formalise and document basic employment systems on site. Review grievance mechanisms to ensure ready access for all workers (including third parties) in light of changes to working arrangements.
Workforce characterised by atypical and informal working arrangements (e.g. fixed term contracts, day or casual labour).	There may be less clarity about future labour requirements and job prospects for workers, particularly where there is a partial return to work, or multiple levels of contractor on site. In light of uncertainty around economic conditions and prospects for ongoing work, workers' bargaining power may be limited, and workers may be more likely to accept poor working conditions (e.g. excessive overtime, forced labour, non-compliance with legislation).	Prior experience of satisfactory work on the project is likely to be an objective reason for selection of workers to return to site, as operations recommence. To the extent possible, site managers should be aware of any formal (or informal) commitments given to workers relating to priority re-hiring. Where efforts are made to 'rotate' work opportunities to suitable workers, selection should be made on the basis of non-discriminatory criteria. These efforts should not lead to the deterioration of previous arrangements relating to safety, training, terms and conditions and worker information and communication.

Sector characteristics	Potential challenges	Potential responses
Many construction workers, especially on remote sites, are migrant workers (internal or cross-border).	Where sites have been closed, it may be difficult or impossible to recall workers, especially where the workforce comprised large proportions of internal or cross-border migrants who have returned to their homes or country of origin. Migrant workers may be vulnerable to exploitation in the recruitment or re-hiring process; for instance, where travel is required or where labour intermediaries are used. There may be challenges in communicating with migrant workers where they are engaged through third parties, there are multiple language groups on site, and workers have low literacy levels. Foreign migrants may face barriers in accessing health services and may not receive the same social security coverage as nationals.	Consider plans for local recruitment in locations where it may not be practicable for departed migrant workers to return in the short term. Where new recruitment is required, or re-hiring is possible, make sure that induction training programmes are respected. Introduce measure to prevent migrant workers having to pay for the costs of returning to work (e.g. medical checks, visas, transport). If labour intermediaries are used, conduct background checks to ensure they are reputable and operating legally. Ensure that communication and training about changes to working arrangements are provided in a language that workers (including contracted workers) understand. Make use of different kinds of media to address potential literacy issues and gaps in communication (e.g. posters and illustrated diagrams posted in prominent positions on site). Ensure migrants have access to adequate onsite medical facilities with protocols for isolating individuals, and refer them to external providers if C-19 is suspected.
Workers may rely on employer-provided accommodation, canteens and transport, particularly where worksites are remote or there is a significant proportion of migrant workers on site.	Workers may still be in worker accommodation, but not yet able to return to work. This may lead to additional pressures on living facilities and limit prospects for social distancing, (e.g. significantly more use of leisure, dining and health services, than they were designed for). Compliance monitoring and responding to worker grievances can be more challenging.	Ensure ongoing monitoring of standards of on-site or near-site worker accommodation. Ensure onsite health clinics are adequately equipped, and that there are designated transportation services to take workers to other facilities if needed. Ensure multiple entry points to report grievances (e.g. SMS, WhatsApp, hotlines) and make sure these are explained through the onsite induction and worker briefings). In some cases, it may be a public health requirement that workers do not leave the site, or that such movement is minimised. Workers' movement should not be unreasonably constrained, and efforts should be made to engage and communicate with the workforce as developments in the public health situation arise. Take steps to maintain worker wellbeing and mental health, recognising that the COVID-19 outbreak, and the return to work, may lead to stress and anxiety for some. If not managed properly, resulting impacts may include conflict among workers living onsite or with local communities or other risks to the project.
Project requirements or social distancing measures may require rotating cohorts of onsite workers.	Social distancing requirements may make it necessary to create smaller teams or restrict the amount of work and social contact between sub-contractor teams. Teams may have staggered shifts and break times. This may restrict the flow of information around the site.	Make sure procedures are in place so that supervisors on all teams are adequately informed about return to work plans and how to communicate with teams on any new policies or procedures. This is also an opportunity to refresh general people management skills and reinforce knowledge of company policies and procedures.

4.2   Agribusiness

Many agribusiness operations have continued operations throughout periods of lockdown, and may not be contemplating a 'return to work' as such. Nevertheless, most are likely to be experiencing other kinds of operational and workforce challenges, and are adapting and updating management practices as a result.

The precise nature of issues experienced by agribusiness employers, and relevant responses, will depend on their position in the value chain and specific crop/production methods. This section largely focuses on primary agriculture; companies involved in processing may refer to section 4.1 on manufacturing.

Sector characteristics	Potential challenges	Potential responses
Agribusiness companies may be facing continued or increased demand for goods as a result of the COVID-19 outbreak. In parallel, companies may also experience decreased revenue as a result of disruptions to business partners, transport or supply chains. Labour needs vary considerably throughout the year, corresponding to time-sensitive production cycles with narrow windows of time for certain activities. There is typically a spike in labour requirements for harvest season, which often involves significant recruitment of short-term seasonal workers, many of whom are internal or cross-border migrants.	Where demand has increased, or where seasonal migrant labour is in short supply due to ongoing travel restrictions, employers may face acute labour shortages at production-critical moments. This may lead some employers to take recruitment shortcuts or use labour intermediaries to fill short-term gaps. The combination of increased demand and labour shortages may also lead to substantial additional pressures on productivity and working time, including on daily hours and weekly rest. Some categories of agricultural workers (seasonal or piece-rate workers) are not covered by labour law provisions on working time, or are covered under separate rules.	Carefully monitor working hours and overtime to ensuring ongoing compliance with labour and OHS legislation. Where national laws on working hours have been relaxed as a government response to COVID-19, safety principles should still be paramount. Conduct background checks to ensure new labour intermediaries are reputable and operating legally. Ensure all new workers (including seasonal workers) receive training on company policies and procedures, including information on grievance mechanisms. Ensure multiple grievance entry points (e.g. SMS, WhatsApp, hotlines). Where possible, maintain communication with buyers to explain workforce management challenges related to increased demand, supply disruptions or labour shortages (including pressures on working time). Discuss the possibility of adjusting timelines so that orders can be met safely with the available workforce capacity.
Workforce characterised by atypical and informal working arrangements (e.g. seasonal, day or casual labour).	Workers' bargaining power may be limited due to uncertain economic conditions and prospects for ongoing work, and workers may be more likely to accept poor working conditions (e.g. excessive overtime, non-compliance with legislation).	Raise awareness of worker rights and entitlements through training. Use different kinds of media to address potential literacy issues and gaps in communication (e.g. posters and illustrated diagrams posted in prominent positions on site). Ensure multiple entry points for grievances (e.g. SMS, WhatsApp, hotlines) and make sure these are explained through the onsite induction and worker briefings).

Sector characteristics	Potential challenges	Potential responses
Many workers are internal or cross-border migrant workers.	Many migrant workers will be unable to travel for the usual peak season, as a result of cross-border restrictions on movement. Since many seasonal workers return to the same agricultural sites year on year for harvest, their absence will mean a loss of skilled workers. Employers may have to spend additional time and money on recruitment and training, and may experience decreased productivity.

Where employers are still able to bring in workers from other regions or countries, migrant workers may be at greater risk to exposure at work or in accommodation (e.g. cramped transport and accommodation). Migrant workers may be vulnerable to poor recruitment practices (see above). | Consider plans for local recruitment where regular seasonal migrant workers are unable to return in the short term. Where new recruitment is required, make sure that induction training programmes are respected.

Where migrants can return, undertake a risk assessment to identify 'at risk' worker populations, high risk activities and potential virus transmission points. Provide ongoing engagement and information to migrant workers in languages they understand and make sure grievance mechanisms are accessible to migrants. |
| Work often takes place in teams. | Employers may need to alter the organisation of teams in order to ensure worker safety. Staggered working times or segregated cohorts of workers may be introduced to minimise contact, meaning less work and less social contact between teams. | Communicate clearly and often with the workforce (including seasonal workers) about any changes to working arrangements and the reasoning behind the changes. Communication should be treated as an ongoing process, not a one-off event. This may include updates or briefings, and written information to improve understanding of COVID-19 risks, national policies, company policies and actions.

Make sure there are procedures in place to ensure supervisors are adequately informed about relevant laws and standards. This is also an opportunity to refresh general people management skills for supervisors, and to reinforce knowledge of policies and procedures. |
| Employers more likely to provide non-wage amenities and benefits (e.g. food, worker accommodation, childcare, on-site health facilities). | Greater potential for C-19 exposure (e.g. exposure through transport and accommodation) and increased employee reliance on employer-provided services. | Adapt accommodation facilities and transport services to promote social distancing requirements, and ensure there is ongoing monitoring of accommodation standards. Ensure on-site health facilities are adequately equipped, and that designated transportation services can take workers to other sites if needed. Consider extending supports, such as provision of in-kind benefits, (e.g. food). |
| Some parts of the agricultural workforce are highly feminised. | Women are often over-represented in the most vulnerable segments of rural labour markets. This brings additional GBVH risks, particularly where economic opportunities are more restricted than usual, and where women are underrepresented among supervisors and managers. For instance, workers who have responsibility for seasonal recruitment or compensating for output (e.g. compensation for piece work) may be at greater risk of GBVH. Risks of GBVH may also be exacerbated where physical distancing has led to more dispersed work positions, and there is less communal or peer oversight.

Women workers are more likely to have caregiving roles and responsibilities. This might constrain their ability to engage in paid work, or lead to children accompanying women to work, thereby increasing child labour risks. | Ensure robust and transparent recruitment procedures are in place. Review grievance mechanisms to ensure they are adequate for GBVH reporting and provide alternative contact points beyond immediate supervisors. This is particularly important where supervisors are predominantly male.

Engage with women workers to understand challenges posed by C-19, including childcare and safety obligations.

Conduct a risk assessment focusing on the potential for child labour in situations where women are working and childcare is unavailable. Ensure child labour policy commitments are in place, and that supervisors and workers are adequately trained. |

4.3   Financial services

Sector characteristics	Potential challenges	Potential responses
Many roles are desk-based, and do not involve face-to-face contact with clients.	Where workers can continue to perform their roles remotely, their return to pre-COVID work locations may be delayed. This entails a range of ongoing people management challenges, including: keeping a dispersed workforce engaged, informed, and productive; supporting workers juggling paid work with childcare while schools and childcare facilities remain closed; ensuring all workers have access to the infrastructure and workspace they need to carry out their work.	Remote working may continue to be the norm for many roles. Ensure these workers continue to be adequately supervised and given the support (including technology and ways to protect confidential information) they need to carry out their work. For more detail, refer to the CDC Guidance on Remote Working.
Some financial institutions have a decentralised structure, with a network of branches or offices where staff have limited direct contact with head office.	Branch managers will be increasingly relied on to ensure branch staff are kept informed and updated about changes to working arrangements and company policies and procedures.	Ensure local managers receive the training they need to inform and communicate with their staff, and to ensure a smooth return to work and consistent roll-out of any new policies, specifically those relating to return-to-work. Ensure that adequate grievance mechanisms are in place so that workers can readily raise grievances with contact points outside their branch.
Some roles rely on direct contact with the public, e.g. loan officers and branch staff.	Workers in public-facing roles may experiences delays in returning to work, depending on how lockdowns are eased. Workers may feel anxious about returning to work in public-facing roles and about transmission risks arising from public contact. Workers in public-facing roles may also be vulnerable to verbal or physical abuse where customers are in financial distress as a result of the COVID-19 outbreak.	Communicate clearly with all workers in public-facing roles so that they understand the return to work plan, the safety precautions put in place and how to report any concerns they may have. Where workers are unable to return to public-facing roles (e.g. because of personal or family member health conditions), explore options for transfers to back-office roles. Ensure workers are trained and feel supported to deal with customers in financial distress, and understand when and how to escalate customer-related matters to their managers.
Some roles may be predominantly occupied by women (e.g. administrative staff).	Women workers may be unable to return to work, or may require greater flexibility in working times due to caregiving roles and responsibilities.	Communicate with staff before work recommencement and assess workers' needs, including obstacles to continuing work. Allow for flexible or remote working options where possible. Where this is not possible, consider providing additional carers' leave or livelihoods support, and a phased approach to workplace reintegration.

4.4   Manufacturing

Sector characteristics	Potential challenges	Potential responses
The COVID-19 outbreak could have a range of effects on demand. Orders may be more volatile as demand fluctuates or as the supply of inputs or raw materials becomes unreliable. In some instances, demand for output may be higher due to order backlog or production of items deemed essential (e.g. PPE). In some cases, ongoing depression in demand may mean there is not enough production demand to enable a full return to work.	On some production sites, there may be additional pressures on working hours, leading to increased overtime, either as a result of a sudden increase in orders or where the full return of the workforce is not feasible. In light of increased economic uncertainty, workers may be willing to work extra hours due to concerns about job security or to make up for lost or diminished wages during lockdown. Increased or fluctuating demand may lead some employers to make recruitment shortcuts or greater use of labour intermediaries to fill short-term gaps. Where there is decreased demand, workers may continue to be out of work for a lengthy period of time.	Carefully monitor working hours and overtime to ensuring ongoing compliance with labour and OHS legislation. Where national laws on working hours have been relaxed as a government response to COVID-19, safety principles should still be paramount. Before recruiting new staff, consider whether there are any employees remain on furlough and – with additional skills training – could be used to fill the positions. Where recruitment intermediaries are needed, conduct background checks to ensure they are fully licensed and have processes in place to mitigate risks of forced labour. Ensure all new staff (including third party workers) receive training on company policies and procedures. Where workers are unable to return to work for a long period, consider what kind of ongoing support is possible. This may include engaging with buyers or off-takers to coordinate support packages or connecting workers with government services.
Work typically takes place at fixed locations, in teams, and is dependent on access to physical materials and machines.	Remote working is typically not possible for non-administrative staff, but physical distancing may be difficult on some production sites. For instance, production lines may bring workers into close proximity with one another, and machinery or workstations may be difficult or impossible to shift. In order to ensure worker safety, employers may need to carry out a phased return to work (i.e. gradual return of workforce) or reorganise worker shifts (e.g. staggered start and finish times to reduce crowding at entry and exit points).	Where it is not safe or feasible for the full workforce to return to work, develop clear and non-discriminatory selection criteria for selecting workers. To the extent possible, workers and their representatives should be consulted to assess their needs, concerns and availability. Before introducing changes to working terms and conditions, check national laws, applicable collective agreements and employment contracts to determine possible changes to working conditions and the kind of process (e.g. consultation) to follow. Consult with unions or other workplace representatives about the return to work (and specific OHS issues and concerns) and maintain regular dialogue once workers have returned to production sites. Communicate clearly and often with the workforce (including with relevant third-party workers) about how the return to work is being managed, particularly any changes to working terms and conditions and the reasoning behind the changes. Communication should be treated as an ongoing process, not a one-off event. This may include updates or briefings, and written information to improve understanding of COVID-19 risks, national policies, company policies and actions. Communication approaches should account for differences in literacy and language proficiency. Make sure disciplinary policies are updated to reflect any new COVID-19-related policies and consequences for breaches. Any changes should be communicated to all staff. Ensure grievance mechanisms are updated to take into account any new working arrangements, including team configurations and staggered working hours, and that all workers have ready access.

Sector characteristics	Potential challenges	Potential responses
Production line work is typically carried out in small team units, closely managed by supervisors.	Social distancing requirements may bring new responsibilities and management challenges for supervisors. For instance, it may be necessary to create small fixed teams and restrict the amount of work and social contact between teams. These small teams could arrive, take breaks, have lunch and leave at the same time. There may be new GBVH risks as a result of increased authority for supervisors, and decreased job security for workers. Past studies have shown women are more vulnerable to GBVH where supervisors are predominantly male and have greater discretionary control over bonus allocation. GBVH risks may be exacerbated where physical distancing has led to more dispersed work positions, and there is less communal or peer oversight. In some instances, supervisors may not be able to return to work immediately (e.g. due to care responsibilities, personal or family illness or vulnerability to COVID-19).	Make sure all supervisors are adequately informed about return to work plans and how to communicate any new policies or procedures with workers (including third party workers). This is also an opportunity to refresh general people management skills and reinforce knowledge of company policies and procedures, including those related to GBVH. Ensure grievance mechanisms are adequate for GBVH reporting, and provide alternative contact points beyond immediate supervisors. This is particularly important where supervisors are predominantly male. It may be necessary to train additional managers and supervisors to fill gaps in oversight and management in response to or anticipation of absences. (This may also represent an opportunity to address gender imbalances in management.)
Some manufacturing sub-sectors are highly feminised.	Women are more likely to have care responsibilities (including children, elderly relatives and sick family members) and these responsibilities may have increased as a result of COVID-19. This may introduce new constraints on their work time. There may be new personal safety concerns for women if shift patterns mean that workers are required to leave workplaces later and in darkness.	New shift patterns may affect workers with care responsibilities differently (often women). They may require additional support or benefit from the allocation of particular shifts. Ensure the workplace is adequately lit and there are safe transport options for workers arriving or leaving in darkness.
Workers may rely on public transport or employer-provided transport to arrive at work.	Social distancing rules mean public transportation vehicles will not be operating at full capacity. This means workers will not all be able to arrive at the same time and – in the case of public transport – may arrive late if they cannot board vehicles. Local authorities may request employers to stagger start and finish times in order to avoid crowding at peak times.	Using public transport will probably involve staggered working hours to ensure workers avoid peak times. It may be helpful to contact public authorities to discuss how best to manage worker movements, in the interests of maximising worker and community safety. Where local travel restrictions effectively limit the ability of workers to get to work, it may be necessary for employers to provide or cover the costs of accommodation. Where employers cover costs of local accommodation, this should not result in a substantial deduction from worker wages, and should be the subject of consultation and agreement, both in line with national law. Employers should also take care to carry out basic due diligence on hotels and accommodation facilities provided by third parties.
The workforce may include a significant proportion of migrant workers or other vulnerable groups.	Migrant workers may be at greater risk to exposure at work or in accommodation (e.g. inadequate space in the workplace, cramped transport and accommodation, no or limited access to medical support, testing or PPE). Internal or cross-border migrants may have returned to their homes or country of origin, making recall difficult.	Undertake a risk assessment to identify 'at risk' worker populations, high risk activities and potential transmission points. Adapt accommodation facilities and transport services to promote social distancing requirements, and ensure there is ongoing monitoring of accommodation standards. Ensure up-to-date worker contact information is recorded, and that communication is maintained with workers who may have returned home (e.g. to rural areas). Consider support for workers who need to return to their place of work (e.g. employer-provided transport). Make sure information is provided to workers in languages they understand.

4.5   Retail/business to consumer

Sector characteristics	Potential challenges	Potential responses
The COVID-19 outbreak may have led to significant changes in demand and uncertainty about future demand. In some cases, there may have been a significant slump in demand (e.g. where shops have closed due to lockdown), while demand for goods and services may be higher for certain companies (e.g. retail in essential goods and services).	Where there is decreased demand, workers may continue to be furloughed for long periods of time. Where there is increased demand, there is likely to be increased pressure on working hours, with potential risk of excessive overtime.	Where workers are unable to return to work for a long period, consider what kind of ongoing support is possible. Where there is increased demand for goods and services, ensure working hours, overtime and break times are closely monitored.
A considerable number of roles require contact with the public (e.g. delivery drivers, retail staff).	Workers in public-facing roles may experiences delays in returning to work, depending on how lockdowns are eased. Workers may feel anxious about returning to work in public-facing roles and about transmission risks arising from public contact.	Communicate clearly with all workers in public-facing roles so that they understand the return to work plan, the safety precautions put in place and how to report any concerns they may have. Where workers are unable to return to public-facing roles (e.g. because of personal or family member health conditions), explore options for transfers to other roles.
Some workers may be engaged through on-demand arrangements (e.g. drivers in the gig economy) or commission arrangements.	It can be more difficult to communicate safety precautions and any changes in working arrangements with workers who may have multiple clients and who log in through digital platforms. Where there is rising unemployment as a result of COVID-19, there may be downward pressures on income and working hours, with workers willing to accept lower fees for given tasks.	Ensure workers receive clear information about safety precautions and any changes in how work is distributed and carried out. Explore whether digital platforms can be used or adapted to convey crucial information. Where possible, monitor working hours and income through online platforms.
Some roles may be predominantly occupied by women (e.g. sales staff).	Women workers may be unable to return to work due to caregiving roles and responsibilities (for example, where schools or childcare facilities are closed).	Communicate with staff to assess workers' needs, including obstacles to continuing work, before recommencement. Allow for flexible and remote working options where possible. Where not possible, consider extending forms of livelihood support and a phased approach to workplace reintegration.

4.6   Healthcare

While healthcare facilities will not be contemplating a return to work as such, as peak infection rates pass and demands on services gradually decrease, they may be contemplating other kinds of transitional or new arrangements while also maintaining contingency arrangements for future spikes or waves of infections.

Sector characteristics	Potential challenges	Potential responses
Healthcare facilities have been subject to unprecedented health risks and pressure for services as a result of the COVID-19 outbreak. Healthcare providers may face a 'delayed peak' involving other health issues once COVID-19 subsides.	Staff have faced increased workload intensity, heightened health risks and increased hours as a result of COVID-19 infections, with attendant risks for physical and mental health. This is not a sustainable pattern of work over an extended period of time, and may lead to stress, exhaustion and burn-out among some staff.	Consult with staff about options for alleviating pressure, such as introducing additional restorative leave or altered shift patterns. Ensure workers have ready access to –and are strongly encouraged to use – health services that support their physical and mental wellbeing. Ensure all staff have ready access to a formal grievance mechanism and are encouraged to raise any concerns about their workload or ongoing working arrangements.
Some healthcare workers may have been assigned to different roles during the COVID-19 outbreak due to increased demand for services, temporary suspension in some facilities or operations, or personal health vulnerabilities.	Where countries pass the peak of COVID-19 infections, it may be possible for healthcare facilities to gradually transition back to an operational model that is closer pre-COVID arrangements. Workers may be concerned or anxious about the timing of this change or may have concerns about switching back to their old role.	Communicate clearly with staff about any proposed transition or changes, and ensure all staff understand the reasoning. Ensure there are clear channels in place for ongoing communication and consultation with the workforce. Identify opportunities for workers to make use of new skills gained during the COVID-19 outbreak. Ensure workers are aware of plans to cope with possible future spikes in infection rates, including prospects for rapidly transitioning workers to different roles again.
Some roles may be predominantly occupied by women.	Women workers may be struggling to manage paid employment with care responsibilities or are unable to return to work due to caregiving roles and responsibilities.	Communicate with staff and assess workers' needs, including obstacles to continuing work, before encouraging work recommencement or a return to previous roles. Continue to allow for flexible and remote working options where possible.
Parts of the workforce (e.g. administrative roles, doctors delivering online consultations) may have been working remotely.	Workers may not need to return to work or may be concerned about returning to healthcare facilities.	Remote working may continue as the new norm for some roles. Ensure these workers continue to be adequately supervised and given the support that they need to carry out their work. Communicate clearly with any workers returning to pre-COVID work locations and ensure all staff understand the reasoning. Ensure there are clear channels in place for ongoing workforce communication and consultation.
Some healthcare workers (e.g. nurses) may rely on shared worker accommodation.	Accommodation use may create pressures on living facilities and limit prospects for social distancing (e.g. significantly more use of leisure, dining and health services than they were designed for). In some cases, public health requirements may limit the ability of workers to leave worker accommodation.	Ensure there is ongoing monitoring of standards of on-site or near-site worker accommodation. Workers' movement should not be unreasonably constrained. Engage and communicate with the workforce as developments in the public health situation arise. Mental health implications should be understood and communicated to the workforce, and adequate supports (e.g. focus groups, hotlines, activities) should be implemented.

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