CDC Group COVID-19 Guidance for Employers

Important note: *CDC Group is the UK's development finance institution (DFI) and not the US Center for Disease Control and Prevention. This guidance does not constitute medical advice and is not a substitute for professional advice from international public health organisations such as the World Health Organization (WHO), national public health authorities, and national governments, which should be consulted for qualified and more detailed information. We strongly encourage our investees to seek daily updates from these sources as COVID-19 spreads/evolves.*

1. Purpose of the document

Every company is trying to understand how to manage their workers' exposure to Coronavirus disease (COVID-19). As an employer and investor, CDC has access to a great deal of external guidance and good practice amongst our investees and fund managers on how to reduce their workforce exposure to COVID-19.

This document is a summary of publicly-available guidance and examples of practice adopted by some CDC Group investees and fund managers. The aim is to provide a framework of thinking that can be applied to many companies and situations, but this guidance cannot cover all circumstances and not every company will be able to benefit from all of the guidance, in particular if employees cannot work from home or practice social distancing. Furthermore, every company is different and a strategy which is suitable for one employer may not work for another. If your company or investee is facing any specific issues and would like to discuss how to handle these situations, please reach out to your ESG Impact contact.

Other business risks: This document is not intended to provide advice on business continuity or other business risks that companies may be facing as a result of COVID-19. If you are facing or anticipate any risks to revenue or business continuity, please speak to your CDC Group investment lead.

2. Understanding how COVID-19 spreads[1]

It is possible to catch COVID-19 either by breathing in droplets coughed out or exhaled by a person with COVID-19 or by touching eyes, nose or mouth after handling a contaminated object. All sections of society – including businesses and employees – must play a role if we are to stop the spread of this disease. We therefore encourage our investees to identify the business activities that could expose workers or others and follow the practical steps suggested below to prevent spread of COVID-19.

3. Practical steps that employers can take

Steps will vary dependent on nature and location of industry, exposure to infection, supply chains, etc. The following steps and measures are far from exhaustive and should be reviewed and updated as the situation evolves.

3.1 Basic infection prevention[2]

The following basic infection prevention measures, drawn from the WHO, can protect individuals from getting sick and spreading sickness:

- Promote and enforce frequent handwashing and respiratory hygiene
- Discourage touching eyes, nose, mouth
- Ensure workplace is clean and hygienic, and regularly disinfect surfaces and objects

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[1] https://www.who.int/docs/default-source/coronaviruse/getting-workplace-ready-for-covid-19.pdf?sfvrsn=359a81e7_6

[2] For more detailed advice and posters you can put around your workplace, please visit: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public

- Advise employees to stay at home when sick and to seek medical advice if they have fever cough and difficulty breathing
- Practice social distancing where recommended
- Stay informed and follow advice from international health organisations such as the WHO and your national health organisation and government

In addition, it is strongly advised, and in some countries required, that large gatherings and international travel should be avoided.

3.2 Policies and procedures

Companies should consider developing specific policies and procedures to be prepared for preventing, identifying, mitigating, and responding to instances of COVID-19. These should be informed by the risk identification and mitigation process below and may include:

- Prevention procedures covering basic hygiene, cleaning and disinfection, PPE, customer engagement, supplier management, and visitor management
- Policies and procedures on how to determine and manage suspected and identified cases
- Updated working condition policies as appropriate
- Stakeholder engagement procedures where operations or changes to operations might impact the community

Once developed, policies and procedures should be communicated clearly to workers and, as applicable, to contractors/sub-contractors, workers in worker accommodation sites, visitors, customers, supply chain, and the surrounding community. They should be and reviewed in line with the latest advice and requirements from regional and international authorities. Some companies may be required to report cases and/or follow specific protocols, in line with national mandates.

If current employment policies are inadequate to provide protection in the case of a worker or worker family member illness, or in case of reduced or closed operations, companies should review and – if at all possible – update policies and procedures to cover these extenuating circumstances. These circumstances may include but are not limited to sick leave, extended paid leave, leave for caretaking responsibilities, contractor payment terms, flexible working, etc.

It may be appropriate to develop and communicate a clear policy of non-discrimination to reduce stigma so that employees feel safe reporting illness of themselves or within their families. All policies and procedures should be clearly communicated alongside contact information and access to a grievance mechanism should employees have questions or concerns.

3.3 Risk identification and mitigation

Where companies already have risk assessment processes, they should follow these to identify infection spread risks to the workplace, workforce, business operations, customers, and community. This may result in or contribute to an Infectious Disease Preparedness and Response Plan. This assessment will be unique to each company and should consider both structural and behavioural risks and mitigation measures.

If a company does not have a risk assessment process in place, then they can follow a hierarchy of control approach to identify and mitigate risks.[3]

Good mitigation practices that have been suggested by CDC Group investees include:

- Identify which workers can work from home, if possible, and provide them with the appropriate technology
- Encourage alternative methods for interaction where possible, for example phone calls instead of in-person meetings
- Avoid customary social contact (e.g. handshakes)

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[3] https://www.osha.gov/Publications/OSHA3990.pdf

- Companies that have fingerprint biometric systems should consider replacing them with card entry systems
- Make hand sanitizer and/or ablution facilities with soap available at all areas where risk of transmission is identified (e.g. upon entry to the premises, in canteen, in toilets, etc.)
- Where hand sanitizer is not available due to shortages, the importance of personal hygiene and the practice of proper handwashing with soap will be essential
- Where possible, consider use of infrared laser thermometers to check workers' and visitors' temperature before entering the premises
- Where possible, reduce number of workers in the workplace to enable social distancing, supported by appropriating additional space, e.g. conference rooms, to allow people to spread out
- Identify areas of transmission risk through e.g. food preparation, engagement with the public, etc. and implement appropriate measures in line with international recommendations of personal protective equipment (PPE)[4]
- Communicate good practices to workers and visitors at key areas, such as entry points or lavatories, through posters and signs as well as reminders from designated staff like receptionists
- Companies with direct-to-consumer sales should consider hygiene practices when dealing with cash and products
- Consider whether transmission could be done through materials e.g. packaging and respond accordingly
- Where possible, communicate with surrounding communities and supply chain to confirm awareness of the virus and discuss good hygiene practices and precautionary measures
- If restrictions on site access will impact the community, e.g. by closing access paths, clearly communicate this with community leaders and discuss the implications

3.4 Leadership and communication

It is important for senior leadership to provide clear and regular communication about preventive measures and precautions to workers and, where applicable, contractors, the supply chain, customers, and the wider community.

Senior leadership should consider providing regular updates to the entire workforce, including contractors, with information on:

- Current status of COVID-19 and how it may impact the workforce and, as appropriate, other relevant stakeholders such the company's clients
- Summary of how different areas of the business will operate and key risk mitigation priorities
- Actions being taken on areas including travel, working from home, meetings, conferences, screening processes, social distancing in the office, hygiene, and transportation
- Workers' rights including information on relevant workplace flexibilities and protections including medical evidence requirements for sickness, sick leave and pay, working from home
- If appropriate, and in close consultation with local health authorities, updates on any cases within the workforce and advice for anyone who might have come in contact with the affected individuals
- What is needed from workforce (mindset, hygiene, personal health)
- Request workers to inform management of suspected cases within their families and social circles
- Any new standards being implemented e.g. approvals for or cancellation of all non-essential travel and conferences
- Resources for any physical or mental health concerns, noting that this can be a stressful time

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[4] https://apps.who.int/iris/bitstream/handle/10665/331215/WHO-2019-nCov-IPCPPE_use-2020.1-eng.pdf

Focal points or dedicated hotlines/email addresses should be set up and communicated so workers can direct questions or concerns accordingly. In addition to email and verbal communication, companies should consider the use of SMS messaging to keep workers informed.

It is recommended to place pictorial guidance on symptoms of COVID-19 and good hygiene techniques in prominent places around company premises. Support these efforts with trainings as necessary. Please note that the WHO has developed many documents for this that can be downloaded and printed or else adapted by companies.[5]

Where applicable, proactive communication with the community should also be part of the COVID-19 response.

3.5 Staff morale

Given uncertainties about COVID-19, staff morale should be monitored. Companies might expect to face increased absences due to illness and the desire not to spread infection to other employees or fear of contagion. Where possible, clearly communicate that employment contracts will be honoured in case of absence due to illness to discourage workers from coming in sick. It is important to maintain frequent and supportive communication between management and workers.

3.6 Vulnerable groups

Early information suggests that older adults and people with serious chronic medical conditions, including heart disease, diabetes, and lung disease, are at higher risk as a result of COVID-19. Pregnant women are also advised to take all preventive actions to avoid infection. Companies should consider additional policies for employees who fall under these categories or who may have caretaking responsibilities for individuals who fall under these categories.

The Center for Disease Control and Prevention does not have confirmed information on the risk of COVID-19 in people with HIV, however this is an emerging situation and updated advice can be consulted on their website.[6]

3.7 Security

Companies should be vigilant concerning risks to workers and contractors arising from potential social unrest associated with COVID-19. Should social conditions deteriorate and companies feel that their workers are at risk, they should discuss with their security providers the best way to assure worker safety while maintaining business continuity.

The use of security personnel should always be conducted in line with IFC Performance Standard 4, which is guided by the principles of proportionality and good international practice to ensure appropriate conduct towards workers and affected communities.

3.8 Retrenchment[7]

Investees facing concerns that they will have to reduce their workforce due to operational changes (supply chain interruptions, government restrictions, cancellation of orders, reduction in sales, etc.) are

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[5] https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public
[6] https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/hiv.html
[7] For more information, please refer to:
IFC Performance Standard 2
(https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps2)
IFC Good Practice Note: Managing Retrenchment (2005)
(https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_gpn_retrenchment)
EBRD Performance Requirement 2 (https://www.ebrd.com/who-we-are/our-values/environmental-and-social-policy/performance-requirements.html)

requested as per IFC Performance Standards (IFC PS)[8] to identify cost-cutting measures before considering retrenchment of direct and contract workers alike. If retrenchment is unavoidable, consideration should be given to developing or updating a retrenchment plan and implementing procedures to ensure a responsible retrenchment in line with IFC PS 2 requirements and the IFC Good Practice Note on Managing Retrenchment. In particular, ensure that the plan is developed and implemented in a way that achieves the commercial aims of the process while minimising the impact of job losses on workers (including casual workers and contract workers) and communities.

The development of such a plan **is a requirement for CDC-financed investments** where a significant number of job losses are envisaged, and CDC expects to be notified should such a situation arise.

See below some of the key principles underpinning such a plan:

- **Impact mitigation:** During the process, efforts should be made to reduce the number of jobs that will be lost and mitigate the effects of the job losses on individuals, groups, and communities.
- **Consultation:** The plan should be founded on widespread consultation (particularly with workers and their representatives such as trade unions) and integrate feedback on the plan.
- **Develop and document fair selection criteria:** Ensure that the selection of workers for dismissal is based on principles that are fair and transparent and do not discriminate against particular groups. More typically, selection criteria involve one or a combination of the following factors: length of service, performance record, disciplinary record, absence record, skills, knowledge.
- **Grievance mechanism:** Each individual has the right to put forward reasons why he or she should not be selected for dismissal or to raise complaints about the way in which the process has been handled. Develop or communicate the existence of an appeal and grievance procedure to ensure the sense of fairness and consultation reaches down to an individual level.
- **Communication:** The process should be transparent and communicated to workers in writing and, for workers who are non-literate, in a way that they can clearly understand. All workers should have the right to initiate the procedure. The process should be completed promptly. Where possible, a manager other than the one who effected the dismissal should hear the appeal or grievance.

4. Which sectors may be exposed to a higher risk of COVID-19

Some industry sectors and company interactions may present a higher risk of coming into contact with affected people or spreading COVID-19. Each company must assess the risks to their workforce, operations, and community. Sectors and company interactions listed below are selected examples where COVID-19 may be more easily transferred among workers or service users. This list is intended to highlight health risk and may not reflect sectors at higher financial risk. Refer to the general and sector-specific guidance in the next section to help in this process.

- **Healthcare** including hospitals, laboratories, clinics, dentists, ambulances, and pharmacies.
- **Food and agriculture** including food processing and those handling live animals and animal products, should practice good personal hygiene and follow food safety guidelines. According to the WHO, based on available information, it is not known whether COVID-19 has any impact on the health of animals and no particular event has been reported in any species.
- **Education sector** (though schools often shut in affected countries.
- Projects that involve **construction and/or worker accommodation camps**, where social distancing and robust hygiene measures may be more difficult to implement.
- **Solid waste and wastewater management.**
- Consumer businesses where workers may come into **regular contact with customers** including hotels and retail.
- Businesses where workers come into contact with **suppliers and supply chains** operating in affected areas.

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[8] Prior to implementing any collective dismissals, the client will carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan will be developed and implemented to reduce the adverse impacts of retrenchment on workers.

- Businesses where there is a **large number of workers that may be concentrated closely together**, particularly those where it is difficult to work remotely.
- **Tourism** and related sectors linked to travel and mobility.
- **Logistics and transport**, where workers come into contact with a large number of people over potentially a large geographic region.

5. **Further resources and responses to frequent questions**

The WHO and its Information Network for Epidemics (EPI-WIN) are providing daily updates on COVID-19, as well as helpful responses to frequently asked questions:

- WHO Daily Situation Updates: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/situation-reports/
- WHO Q&A: https://www.who.int/news-room/q-a-detail/q-a-coronaviruses
- EPI-WIN myth busters: https://www.epi-win.com/advice-and-information/myth-busters

General business guidance

The following international and UK guidance has been provided for businesses. It is strongly recommended to regularly check advice from national organisations in your country/countries of operation.

- WHO: Getting your workplace ready for COVID-19
- Center for Disease Control and Prevention: Interim Guidance for Businesses and Employers
- OSHA: Guidance on Preparing Workplaces for COVID-19

Sector-based guidance

- Healthcare
    - WHO: Technical guidance for healthcare workers
    - WHO: Rational use of PPE for COVID
    - WHO: Q&A on infection prevention and control for healthcare workers caring for patients with suspected or confirmed 2019-nCoV
    - Center for Disease Control and Prevention: Information for Healthcare Professionals
    - Center for Disease Control and Prevention: Interim guidance for laboratories
- Education
    - WHO: Key Messages and Actions for COVID-19 Prevention and Control in Schools
    - UK Government: Guidance for education settings
- Food and agriculture
    - WHO: Recommendations to reduce risk of transmission of emerging pathogens from animals to humans in live animal markets
- Solid waste and wastewater management
    - WHO: Water, sanitation, hygiene and waste management for COVID-19