

RESPONDING TO COVID-19: GUIDANCE FOR SA8000-CERTIFIED ORGANIZATIONS

PREPARED BY SOCIAL ACCOUNTABILITY INTERNATIONAL

Published June 9, 2020

Version 2



MANAGING
LABOR AND
SOCIAL
PERFORMANCE
RISKS

RESPONDING TO COVID-19: GUIDANCE FOR SA8000-CERTIFIED ORGANIZATIONS

MANAGING LABOR AND SOCIAL PERFORMANCE RISKS

Published: June 9, 2020

Version 2

CONTENTS

Introduction	2
How to Use This Guidance.....	2
COVID-19 Salient Risks	3
Child Labor	3
Forced Labor	4
Health & Safety	4
Freedom of Association & Collective Bargaining.....	6
Discrimination.....	7
Disciplinary Practices.....	7
Working Hours	8
Remuneration	9
Management Systems	10
Implementing Your COVID-19 Response.....	11
Role of the Social Performance Team (SPT).....	11
Communication and Training Requirements.....	12
Annex A: Conducting A Risk Assessment.....	13
Risk Assessment Structures	13
Practical Steps	15
Annex B: Additional Resources	17

INTRODUCTION

The global COVID-19 pandemic has resulted in an unprecedented economic crisis. As businesses everywhere struggle to stay afloat, global supply chains have been disrupted, causing workforce depletion and leaving millions of workers in all sectors struggling for livelihoods and survival. Unexpected changes to orders, travel restrictions, and social distancing requirements have also introduced a new dimension to labor risks beyond the health risks posed by the virus itself. In particular, supply chain disruptions have exacerbated the risk for forced labor conditions, lost wages, and discrimination.

Much remains uncertain and volatile, but around the world, governments, businesses, communities, and individuals are finding ways to support each other as we all work to get through the pandemic and its economic fallout. SAI is committed to helping companies maintain high social standards while managing their business contingency issues from COVID-19. We are engaging with peer organizations, companies at every level of the supply chain, and worker representatives to develop consistent, practical guidance and recommendations for mitigating the risks during this crisis.

While much remains uncertain, SAI hopes this document will provide useful guidance to SA8000-certified organizations as they navigate that uncertainty and work to mitigate labor risks and protect vulnerable employees when resuming operations following this crisis. While SA8000 specifically addresses line workers and sub-contracted workers (as they are usually the most vulnerable), the spirit and intent of SA8000 applies to all employees, including supervisors and managers. This is especially important to remember, as this crisis has affected and will continue to affect people at every organizational level.

HOW TO USE THIS GUIDANCE

SAI intends for this document to serve as a practical guide to help organizations resume their operations quickly and safely by assessing and mitigating labor risks posed by the global COVID-19 crisis. We first introduce the salient issues, describing contexts and viewpoints that are necessary for performing an effective risk assessment against COVID-19 concerns. We then provide more detail on tactics and resources for implementation, including an example of a risk assessment structure that organizations can implement directly (Appendix A).

In all cases, certified organizations are still expected to meet local legal requirements. Where legal or regulatory bodies issue guidance or notifications for a temporary period, organizations should follow that guidance so long as it does not violate the spirit and intent of the SA8000 Standard.

APPENDICES

The appendices to this document provide additional detail and resources to help you navigate the labor and business challenges of COVID-19. We will continue to add to and update these appendices in future iterations of this document and as the situation develops.

APPENDICES FOR JUNE 9, 2020 GUIDANCE

- A. Sample Risk Assessment Framework
- B. Additional Resources

COVID-19 SALIENT RISKS

To help organizations conduct comprehensive COVID-19 labor risk assessments, we describe below some of the most salient risks related to each category of the SA8000 Standard and provide examples of practical steps for mitigating those risks. Every organization, country, and region's context will be different. This section is not a checklist that covers all possible risks, but should be used as a guide for thinking about the labor effects of this pandemic and your organization's role in supporting workers.

Risks are presented according to and in the order of the nine elements of the SA8000 Standard.

CHILD LABOR

When work resumes following COVID-19 shutdowns, some workers may not be able to immediately return to work. Migrant workers may have returned to their homes and be unable to travel; some local workers may still be in mandated or self-enforced quarantine due to vulnerable health conditions, exposure to persons with COVID-19, or having contracted COVID-19. In this situation, some organizations may face temporary labor shortages and need to hire new employees quickly. At the same time, many people are facing extreme poverty and are in desperate need of new income.

Anytime organizations find themselves pressured to bring on a large number of employees in a short amount of time, the risk for child labor increases. Difficult economic conditions also contribute to driving families to consider sending children to work, further increasing this risk. In these cases, it is critical for organizations to proactively prevent illegal employment of children and harmful employment of young workers.

PRACTICAL STEPS

- Ensure your organization's recruiting and hiring processes are updated and that managers are aware (especially since there may have been changes on your team because of the pandemic); maintain and verify proof-of-age records for all new employees.

- Confirm that there is a system in place that ensures young workers (if engaged) are only employed in non-hazardous, safe, and healthy jobs.
- Ensure that the recruiting and employment agencies you work with are also managing these risks.

FORCED LABOR

The same conditions that increase the risk for child labor also increase the risk for forced labor conditions. Examples of forced labor are more nuanced and can be more difficult to detect and prevent than child labor, making robust management systems and practices the most important tool to mitigate this risk.

In the current moment, some of the most salient forced labor risks are related to irregular and uncertain availability of work. When people are desperate for income to support themselves and their families they become especially vulnerable to accepting forced labor conditions—e.g. accepting an unhealthy number of hours, extremely low pay, or other poor conditions. While businesses are also struggling in these times, they still have a responsibility to not exploit workers.

PRACTICAL STEPS

- Ensure that all new and returning workers receive clear contracts.
- Confirm that your organization is keeping accurate time and payment records for all employees; especially if work schedules have been changed to comply with new COVID-19 public health regulations.
- Ensure that workers and managers understand that they may remove themselves without penalty if they feel unsafe. For example, due to a lack of COVID-19 safety measures.
- Ensure that any new contracts with recruitment agencies include proactive measures to prevent unethical recruiting practices and forced labor. Confirm that standing contracts include these provisions as well.
- Confirm that any recruitment agencies you work with maintain sufficient evidence to allow for effective monitoring of such provisions.
- Confirm that recruitment agencies do not require payment from recruits. Commit to offset these fees if they are discovered.

HEALTH & SAFETY

The health and safety risks posed by the COVID-19 pandemic are perhaps the most apparent risk category. In most countries, national or local governments have already released extensive guidance and legal orders on the safety precautions business must take in order to resume operations. All organizations must first and foremost follow the legal requirements and temporary government mandates established in their location of business. However, there are large inconsistencies between state responses, with some failing to meet the best practice

recommendations of international public health and economic authorities. For SA8000-certified organizations and others seeking to resume operations in the most responsible way possible, further precautions may be needed.

The most obvious risk to workers as business resumes is a renewed risk of infection if there are not adequate health and safety measures in place to prevent virus transmission. The increased risk of virus transmission also relates directly to several other categories of risk, such as forced labor, sick leave policies, and freedom of association. For example, if workers do not feel empowered to speak up about health and safety concerns, serious risks may not be addressed and may lead to further outbreaks. Workers who do not feel they will be supported during a self-isolation period may report to work despite having symptoms of COVID-19 or having been in contact with someone who has tested positive for COVID-19. Vulnerable populations may accept unsafe working conditions if it is their only opportunity to earn income in the current challenging environment. Furthermore, although there are no documented cases so far of the COVID-19 virus spreading through mail or shipments, large-scale returns to work without adequate protections in place could introduce an increased risk for this type of virus transmission.

When resuming operations, organizations will need to consider whether the infrastructure, layout, and location of the organization may require engineering control measures, such as increased ventilation, installing physical barriers, etc. Administrative controls to reduce contagion may also be needed. Increased communication with workers will be extremely important for reducing the risks of virus transmission in the workplace. Organizations should take a proactive approach, increasing their communication with workers and conducting preventative education (e.g. discouraging unnecessary travel, adding communication with employees after breaks). Regular and refresher training, not just on COVID-19, is important since operations and workforces will have changed, and other health and safety issues still need to be managed.

PRACTICAL STEPS

- Implement protocols to detect illness and reduce physical closeness during entry and exit for all employees and visitors to the workplace.
- Reduce visitors as much as possible and reinforce existing visitor protocols with new health and safety requirements.
- If necessary, reconfigure workspaces and add shifts to allow employees to maintain physical distancing recommendations while working.
- Develop and implement a plan for different phases of workforce return (% of workers returning at different times).
- Implement sanitation protocols at the workplace and in other organization-owned locations (e.g. canteen, dormitory, warehouses, and washrooms) that align with COVID-19 recommendations from government and international authorities (*see Annex B: Additional Resources*). Establish a cleaning schedule to “re-set” workplace sanitation

before and after periods of heavy use (e.g. breaks, before start of work, following weekend holidays).

- Ensure there is a protocol in place for Emergency Preparedness and Response for Infectious Disease Control.
- If appropriate, adopt a policy for monitoring employees' health. Have a plan and protocol for providing immediate attention to employees with signs of illness.
- Make sure that procedures for employee health monitoring, tracking and reporting, still protect privacy and prevent discrimination.
- Allow work-from-home arrangements where possible (including necessary policies and protocols).
- Establish protocols for ensuring adequate sanitation and physical distancing on organization-run transportation for employees.
- Review and revise as necessary protocols for material receipt and dispatch to align with COVID-19 recommendations.
- Review and revise as necessary your organization's health requirements for new recruits. For example, certain types of work may be dangerous for people who have recently had COVID-19, especially in conjunction with other illnesses.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

As many organizations begin to resume operations, there may be both an acute focus on quickly recovering losses and a large degree of uncertainty due to fluctuations in orders and availability of inputs. In this situation, organizations may wish to be more flexible on employment contract terms like working hour expectations, wages, and schedules. While these changes may seem urgent, the extreme situation created by COVID-19 should not be used as an excuse to restrict workers' right to freedom of association and collective bargaining. Changes that will affect workers in these ways should be made in conversation with worker representatives—whether in the form of a union, Social Performance Team (SPT), or other groups in your workplace. Changes to wages may require a new collective bargaining process.

Worker representatives will also be an important resource for distributing information and training to workers and learning about how workers have been affected by COVID-19 and their opinions on workplace safety.

PRACTICAL STEPS

- Proactively engage with union(s) (where present) or worker representatives to discuss challenges caused by COVID-19. Avoid taking a reactive approach.
- Make sure that prevailing COVID-19 conditions are a focus of conversations during collective bargaining processes.
- Work with worker representatives to review and revise as necessary communication processes to improve dialogue and avoid unanticipated work disruptions.

- Ensure that COVID-19 related retrenchment (layoffs) or new hiring procedures do not discriminate against union organizers and members

DISCRIMINATION

Stigma around COVID-19 has increased the risk for discrimination in many communities, being used as an excuse to further stigmatize communities that face discrimination on a regular basis. Organizations should be aware of this risk and work to educate their employees to discourage these practices. In many cases, individuals who have been affected by COVID-19 have been fired due to their positive status or faced discrimination by supervisors, co-workers, or their communities. Despite the dire public health situation, individuals have a right to privacy about their personal health situation. While organizations may be required to share health details with public health officials, they do not have the right to share that information with anyone else inside the organization. Discrimination based on COVID-19 status also has the potential to increase the risk for everyone else in a workplace. If workers do not feel safe sharing their symptoms or status with employers, they may hide that information and continue working.

The chaotic situation caused by COVID-19 also introduces risks for organizations to make employment and wage decisions in a discriminatory manner; for example, by firing long-standing employees to replace them with cheaper new recruits. Organizations should also be aware that a challenging financial situation does not release them from obligations to employees.

PRACTICAL STEPS

- Review your organization's discrimination policy to ensure that it covers potential new types of discrimination created by COVID-19.
- Communicate regularly and transparently with employees to prevent new forms of discrimination or stigmatization related to COVID-19 from taking hold.
- Review hiring and firing policies to ensure they cannot be used improperly as a cost reduction measure.
- Make sure that procedures for employee health monitoring, tracking and reporting, still protect privacy and prevent discrimination.

DISCIPLINARY PRACTICES

The new risks created by COVID-19 will require new policies, protocols, and disciplinary measures to enforce them. However, the new policies and protocols are meant to protect workers and all of our communities, they should not be used as an excuse to enact stringent new disciplinary practices. The ongoing financial challenges and uncertainty caused by the pandemic also introduce the risk for organizations to adopt stringent disciplinary practices as a way to coerce workers to meet tight deadlines, work excessive hours, or accept other indecent working conditions.

PRACTICAL STEPS

- Review existing disciplinary processes and revise as necessary to ensure that the organization is only enforcing new requirements in response to COVID-19 using well-documented, formal policies.
- Communicate new requirements to employees clearly, unambiguously, and transparently. Include justifications for the actions being taken.
- Provide adequate training for all employees on any new policies or protocols.

WORKING HOURS

The COVID-19 pandemic has introduced a wide variety of risks related to working hours. Temporary closures due to lockdowns, changes to shifts and occupancy to comply with physical distancing requirements, fluctuations in work availability due to unpredictable orders, and loss of hours during quarantine all create confusion and uncertainty for workers around their job expectations and pay. Organizations should actively communicate with employees about working hours as much as possible. There may be pressure from both internal and external stakeholders to exceed healthy working hours to complete backlogs or recover lost orders; even given these demands, employers have a responsibility to keep working hours within healthy limits.

If/when planning to make changes to regular working hour expectations, employers need to consider whether those changes require updates to employment contracts. Especially if adding overtime hours, increased risks for several types of human rights violations follow: health risks from over-exertion, risks for forced labor conditions, and risks for violating working hour regulations. In some cases, governments have also made temporary changes to working hour restrictions to support businesses in resuming operations or to contain the spread of COVID-19. These changes may add confusion about legal expectations to the already complex set of questions around overtime and working hours. Employers should take extra care to consider all possible labor implications when adjusting hours for workers.

PRACTICAL STEPS

- Ensure that your organization has a means of adjusting working hours based on the volume of orders.
- Ensure that changes to working hours due to temporarily modified legal requirements are effectively communicated to employees.
- Confirm that your organization's protocol for monitoring working hours accommodates modified requirements, such as time for sanitation, workplace preparation during shift changes, extended breaks, etc.
- Clarify with appropriate authorities if there have been changes in local working hours regulations that impact the organization. Make sure you understand the implications for overtime.

- When changes to working hours are permitted and your organization deems them necessary, conduct an assessment to understand how the changes will impact issues related to health and safety, overtime payments, etc.
- Before making changes to working hours, consider and mitigate the negative impacts on workers.
- Proactively engage with buyers to make them aware of how their purchasing practices impact your organization's ability to maintain compliance with labor laws and SA8000, or other codes of conduct.
- Consult with union(s), where present, or worker representatives to address any modifications to working hours that impact payments to workers.
- Include employment agencies and third-party workers in your organizations' risk assessment and procedures

REMUNERATION

As with working hours, disruptions to work and uncertain work schedules caused by the pandemic and its economic fallout introduce a wide range of risks around remuneration. It is important to remember that, in many cases, workers rely on every paycheck to make ends meet. Delays in wage payments or changes in hours that result in reduced wages may directly impact the health, safety, and general wellbeing of your workers as well as their families. This is a challenging moment both for people and business, so it is likely you will need to make cuts. When cuts are necessary, make sure you carefully consider the implications of those choices for your workers and prioritize cutback that will do the least harm to people in your workforce and supply chain.

PRACTICAL STEPS

- Assess your existing wage disbursement processes and, where possible, strengthen them to avoid discrepancies.
- Communicate with employees in a timely and transparent manner about any delays in receiving wages or modifications to wage policies.
- Ensure that you are monitoring working hours/idle hours effectively so that you can fairly compensate workers.
- Develop a plan and procedure to ensure speedy resolution of wage issues.
- Create a plan to settle owed wages in a timely manner.
- Create a plan to pay owed wages and other legally mandated payments to workers (including migrant workers) who have not rejoined the workforce.
- Review your organization's existing living wage calculation and revise as necessary to reflect challenges to both business and workers resulting from the COVID-19 crisis.
- Proactively plan for how you will address overtime payments in case of temporarily modified local labor regulations.
- Consult with union(s), where present, or worker representatives to address any modifications to wages or payment for workers.

- Consult with government agencies to find additional support and subsidies for workers
- Include employment agencies and third-party workers in your organizations' risk assessment and procedures

MANAGEMENT SYSTEMS

The major advantage of a management-systems approach to social performance (or any aspect of performance) is a higher degree of preparedness for unexpected disruptions. SAI believes that the management-systems approach required by SA8000 will make certified organizations more prepared than most to weather this crisis. For all of the above labor categories, SA8000-certified organizations should already have the framework in place from which to build out policies, processes, and procedures that can support socially responsible actions in this challenging time.

The situation arising from COVID-19 also presents some risks to the integrity of a social performance management system. Lockdowns, adjusted hours, and remote working arrangements create challenges for holding regular meetings, communicating to workers, supporting worker involvement and engagement, and maintaining an effective SPT. There may be a potential for increased complaints or grievances due to unexpected changes to working situations, low worker morale, or a lack of understanding of new requirements. For organizations that need to bring in a large number of new workers quickly, there may be issues monitoring their compliance with system requirements. For all workers, there may be difficulties monitoring compliance with new COVID-19-related requirements or monitoring the efficacy of new training.

There will also be difficulties related to external stakeholders. Differences in the pandemic situation between regions and countries may introduce challenges for supply chain monitoring and control. On the other side, buyers or other system stakeholders may enforce additional monitoring or auditing requirements related to compliance with COVID-19 requirements.

PRACTICAL STEPS

- Review and revise as necessary existing policies and operational procedures to address challenges identified in your organization's risk assessment.
- Review and revise as necessary your communication process with suppliers and sub-suppliers to ensure it is effective in the new environment.
- Create a plan for periodically reviewing your risk assessment to respond to changing legal and operational requirements.
- Create a plan for communicating with employees and training them on any new policies and protocols, as well as existing policies and protocols. Consider any changes in your workforce as you plan
- Empower workers to raise complaints and grievances and ensure your processes for resolving these are appropriate for the current moment.

- Make sure that the actions your organization takes to mitigate COVID-19 risks are effective and practical for the new situation. Do not introduce changes that have very little impact just “for show.”
- Find a way to continue conducting necessary meetings regularly while still following public health guidelines.
- Create a plan to monitor efficacy of COVID-19 measures undertaken and make improvements as necessary to your communications with employees related to revised policies and procedures (including any health and safety conditions).

IMPLEMENTING YOUR COVID-19 RESPONSE

The “Salient Risks” section above introduces a framework for thinking about risks posed by COVID-19, covers some specific risks to be aware of, and provides some example steps you can take to mitigate risk. When you conduct a full risk assessment for your organization (See *Appendix A for a Sample Risk Assessment Structure*), you will likely identify many more specific risks and possible mitigating steps. This section provides guidance on implementing mitigating strategies and monitoring efficacy and compliance. Specifically, SA8000 requires SPT participation in managing your response to COVID-19. We also provide guidance on approaching implementation using a management-systems approach.

ROLE OF THE SOCIAL PERFORMANCE TEAM (SPT)

During this crisis, it is vital that the SPT play a central role in identifying risks created by COVID-19 and developing and implementing organizational policies that respond to them. The SPT is responsible for facilitating SA8000 within certified organizations because of the many advantages of using a competent and empowered worker-manager team to address labor performance concerns.

Workers and managers experience the day-to-day operation of any organization from different viewpoints with different inputs. Where managers have more information about certain organizational risks, they may have limited knowledge about risks that workers face on a daily basis. When workers are empowered through participation in the social performance of an organization, they are able to bring insights and important perspectives on organizational policies and practices.

Therefore, workers must be involved when trying to address the risks posed by COVID-19 and organizational response. Ideally, this will be managed by a trained and experienced SPT that is able to meet to discuss the issues and plan responses. However, in the current situation, the organization’s standing SPT may not be available or able to participate in the organizational planning and response. In cases where the SPT cannot be organized, we recommend the following:

- To the extent possible, inform and query SPT members about organizational planning and response. Invite their feedback on issues that impact the social performance of the organization.
- Inform workers and representatives about organizational planning and response.
- Survey workers to understand their expectations and needs during this crisis.
- Invite worker feedback when drafting a crisis response plan.

COMMUNICATION AND TRAINING REQUIREMENTS

It is essential to communicate effectively with employees about all of your organization's COVID-19 response measures and provide any necessary training on revised procedures and protocols. Organizations should review their existing communications structures to ensure there are proper channels in place for disseminating information to all employees. Keep in mind that you may need to communicate with employees before they return and that some may have traveled away from their local address during the pandemic response. Some practices that may support this effort include:

- Creating a COVID-19 Manager or Team to oversee communication about the revised requirements and to identify areas for improvement.
- Strengthening the existing SPT to manage or provide input on the COVID-19 communication plan.
- If trade union(s) are present, interacting with them frequently and providing updates on the efforts being made.

Share vital information in formats that are easy for all employees to understand, easily accessible to all employees, and inclusive of diverse employee groups. It is good practice to reinforce messaging by dissemination through multiple channels. It is also required that communications are made available to employees in a language they understand.

You may use digital displays, emails, bulletin boards, messaging apps, or any other means to inform employees and associates about revised policies, procedures, and protocols. These communications should be easy to understand for workers regardless literacy and language skills, access to technology, or intellectual disabilities. You may adopt any means of communication that will help employees understand and comply with requirements.

You may want to establish a helpline that employees can call or text to identify and resolve issues they experience in the workplace. Where possible, organizations may also want to use their communication channels to inform employees about (and encourage them to use) government-released apps and other resources to help protect themselves and others.

ANNEX A: CONDUCTING A RISK ASSESSMENT

In SA8000-certified organizations, existing management systems provide stability and continuity in the face of uncertainty and operational challenges; effective systems and monitoring yield improved performance. However, the extraordinary situation caused by COVID-19 has resulted in unusual risks that you may not have previously considered. Organizations should review their risk assessments and management systems in this environment to account for new risks and ensure that all previously understood risks are still being managed appropriately. A proper risk assessment requires a practical and systematic approach, thorough evidence-gathering and effective communication with all stakeholders.

RISK ASSESSMENT STRUCTURES

While there are many possible approaches for conducting a risk assessment, any approach you choose needs to address all risks that affect the overall management system. While health and safety risks may be the most obvious posed by COVID-19, you must consider every element of your management system in your COVID-19 risk assessment.

Risk assessments must be unambiguous, comprehensive, easy to understand, and structured for easy implementation. They may need to include both quantitative and qualitative approaches to gain a full understanding of the risks and the appropriate procedures and practices for addressing them. There is always a risk with qualitative evaluations that risk levels may be downplayed due to their subjective nature. Be sure to take extra care to fully understand the risk level in these cases.

The following table shows an example of a simple risk assessment structure.

Risk	Potential Negative Impact	Probability of Occurrence	Severity of Impact
Name of Risk (e.g. "child labor")	Description of the possible negative impact if this risk comes to fruition.	Low / Moderate / High	Low / Moderate / High

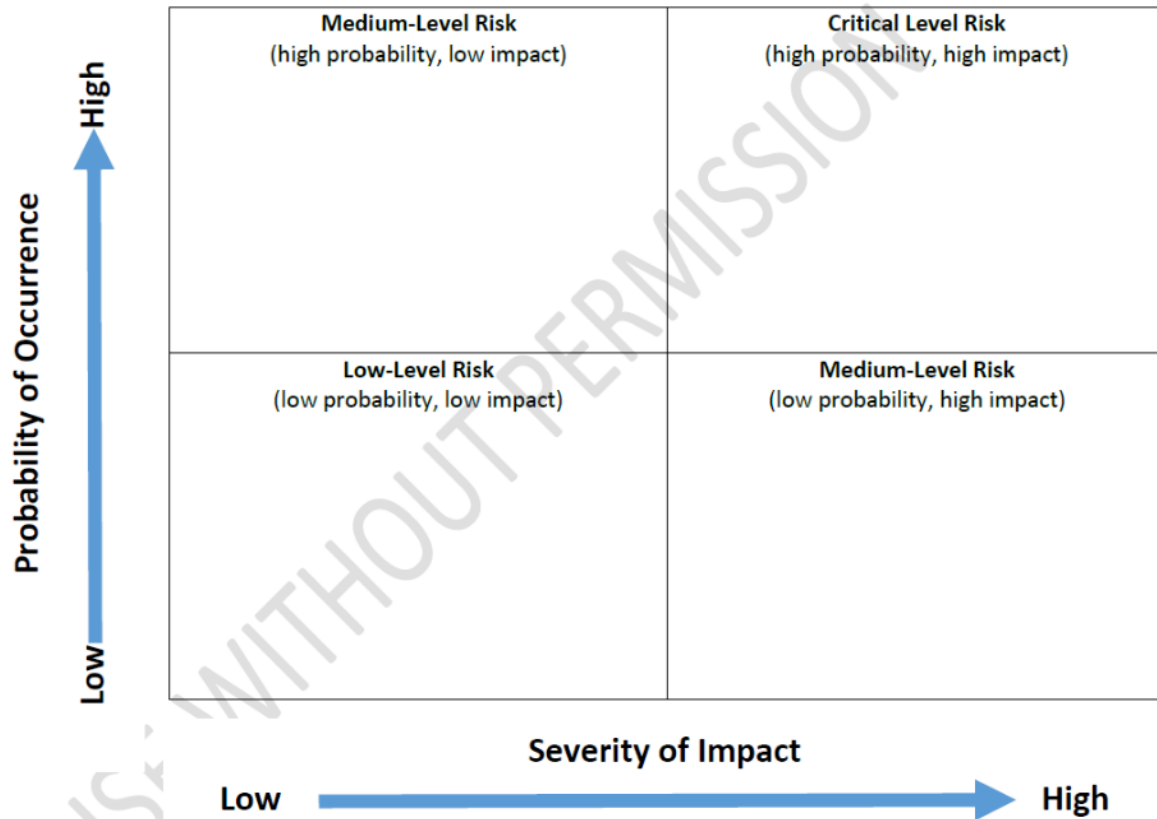
For each identified risk, consider the relative probability of occurrence and severity of impact if it were to occur. Based on these assessments, you can then make an informed, qualitative assessment to address the issues that pose a moderate or high risk. You will then need to take appropriate control measures to mitigate these risks, including revising existing practices and protocols. Below is a non-exclusive list of other factors that could be considered in a risk assessment:

- **Ability to Impact** – What is the ability of my organization to positively affect or mitigate this risk?
- **Exclusive Control** – What risks are totally within the purview of my organization and are thus my responsibility to address?

- **Degree of Culpability** – What risks exist because of the policies or processes of my organization? What risks does my organization create?
- **Risk Categories** – To which categories of risk (labor/environmental/business/health/community) does this risk relate? Who will be impacted by this? Which types of risks should you prioritize?
- **Mitigation** – For identified risks, are there already effective mitigation efforts in place?

In determining which risk factors are most important for your organization to address, you should rely on information from stakeholder engagement, worker feedback, and management discretion. Using multiple risk factors as a basis may help you take an analytical approach to this decision. One effective method is using a risk matrix.

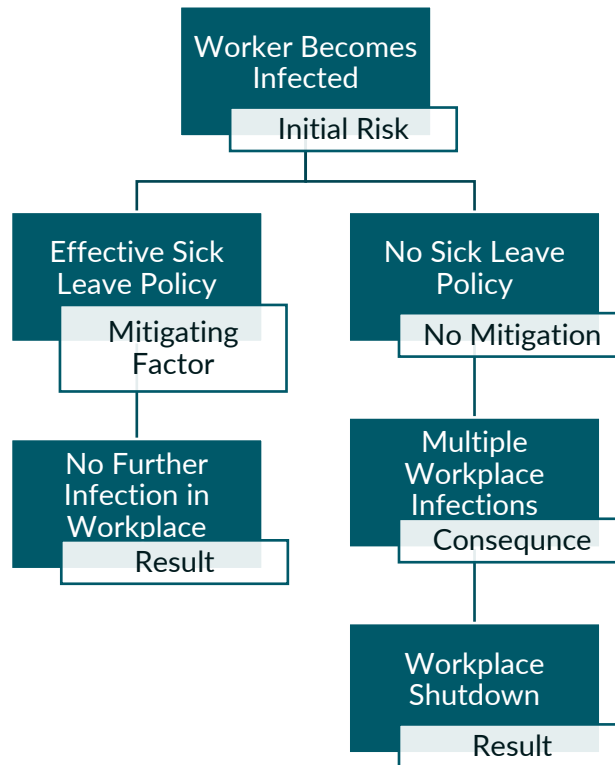
Sample Risk Matrix



In a risk matrix, identified and graded risks are placed in quadrants, allowing you to visually prioritize risks based on their attributes.

Another method for visualizing risks is a risk tree. This analysis allows you to consider a sequence of events to understand the possible outcomes of addressing or failing to address each initial risk.

Sample Risk Tree



PRACTICAL STEPS

The previous sections provide a framework for analyzing and prioritizing risks, but the hard work of risk assessment is in identifying the unique risks to your organization and creating an action plan to prevent and mitigate their effects. This should also be handled in a systematic way, using a management-systems approach. This section outlines the broad steps for understanding your risk landscape and developing and implementing your risk response to the COVID-19 crisis.

- 1) **Map your processes and supply chain to understand your organization’s structure and breadth.**
 - It is critical that you understand where your procedures and policies may be creating risks. What decisions are made or expected in each situation? Who is responsible for each step? How are your expectations of suppliers impacting their ability to address this crisis?
- 2) **Engage with relevant stakeholders to understand the possible risks within your location, industry, and community.**
 - Who has expertise in dealing with health issues? Who has an understanding of the struggles workers and their communities are facing? Who is responsible for implementing government policy?
- 3) **Engage with your workers and management to ensure transparency and open communication.**

- Workers are usually best suited to identify risks within the workplace. The more open and transparent your communication channels, the more effective the risk assessment process.
- 4) After performing the risk assessment, develop and implement policy and operational changes to eliminate or reduce prioritized risks.**
- This requires an improvement plan, which should include training, capacity building, feedback mechanisms, and effective monitoring.

ANNEX B: ADDITIONAL RESOURCES

In addition to this guidance document from SAI, you should be reviewing any guidance from your local or national government agencies, industry sources, and other stakeholders. These will depend on each organization's specific context. In addition to those context-specific sources, we recommend reviewing these international guidelines:

"A safe and healthy return to work during the COVID-19 pandemic." Policy Brief. International Labour Organization, 2020. Access online: https://www.ilo.org/global/topics/safety-and-health-at-work/resources-library/publications/WCMS_745549/lang--en/index.htm

"Beyond Flattening the Curve: Post-COVID-19 Safe Return to Workplace." IAOH Guidance Document. Indian Association of Occupational Health (IAOH), May 2020. Access Online: <http://storage.unitedwebnetwork.com/files/162/8a92d62ee3ce76db774f9064adf4fe60.pdf>

"COVID-19 Guidance for Employers and Recruiters." International Recruitment Integrity System (IRIS), IOM. May 2020. Access Online: <https://iris.iom.int/covid-19-crisis-response>

"Human Rights Due Diligence and COVID-19: Rapid Self-Assessment for Business." United Nations Development Programme (UNDP), April 10, 2020. Access online: <https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/human-rights-due-diligence-and-covid-19-rapid-self-assessment-for-business.html>

"Guidance on Preparing Workplaces for COVID-19." OSHA-3990-03 2020. U.S. Department of Labor, Occupational Safety and Health Administration. Access online: <https://www.osha.gov/Publications/OSHA3990.pdf>

"Safe Return to Work: Ten Action Points." Practical Guidance. International Labour Organization, May 2020. Access online: https://www.ilo.org/global/topics/safety-and-health-at-work/resources-library/publications/WCMS_745541/lang--en/index.htm

FURTHER READING

The World Health Organization (WHO) Publication Library: <https://www.who.int/publications>