

HR Guidelines for RMG Factories in Response to COVID-19

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1. Guidelines Background

Since the first coronavirus (COVID-19) outbreak in China in December 2019, the disease has become a global public health emergency. On 11 March 2020, the World Health Organization (WHO) announced this incident as a pandemic. In the latest WHO report, as of August 2020, the coronavirus (COVID-19) affected 216 countries globally.

In addition to the health impact, the global economy was severely affected at all levels, causing millions of job losses, and the number is still growing. It challenges the existing business models and the way they operated before the pandemic.

According to the Bangladesh Institute of Epidemiology, Disease Control and Research (IEDCR), Bangladesh reported its first COVID-19 patient officially on 8 March 2020. As of August 2020, the total number exceeded more than 200,000 cases and is still growing.

Ready Made Garment (RMG) factories are generally highly labour-oriented and divided into different operational process. These guidelines were developed by Better Work Bangladesh (BWB) to support factory management in addressing the significant number of day to day operational and worker-welfare related issues that need to be addressed because of the pandemic situation.

1.1. How These Guidelines Will Help You

The Human Resource guidelines give you the idea of where the HR/Compliance team's attention may be required in order to have a smooth factory operation, reduce business, human and community health risks and ensure safe day-to-day business operations with less interruption.

These guidelines will help the factory to implement other guidelines and policies, such as BWB Occupational Safety and Health (OSH) Guidelines, Industrial Relation (IR) Guidelines (to be released), Legal Framework and Employment Protection Guidelines and Employee Guidelines. It will also cover the Management Systems related to all the policies and procedures at your factory. Each factory will determine how they will

implement these guidelines in their facility based on their resources, capacity and work priorities.

While implementing the guidelines, policies and procedures, the factories are requested to maintain the gender balance ratio, non-discrimination policies, and use an inclusive and collaborative approach. For example, this includes any committee formation due to COVID-19, participant selection or nomination for trainings, workshops and consultations.

Additional guidance may be needed as the COVID-19 outbreak conditions change, including as new information about the virus, its transmission and impacts become available.

2. Factory HR/ Operational Team

In regular industry practice, the factory HR or Operational Team plays a vital role to ensure the daily operations including proper workforce management, asset management, training, compliance management, occupational safety and health (OSH), etc.

In the current changing business environment due to COVID-19, the HR team needs to think differently about how they can continue their daily operations while ensuring the health and safety of all the workers and the staff. **PDCA** framework (plan, do, check and act), **Root Cause Analysis (RCA)** and **Priority Matrix (PM)**, in addition to HR tools and techniques, will help the HR team to establish proper management systems in the factory. **BWB** may help the factory officials to understand more on how to use those different management system tools and techniques through the existing training program.

The following day-to-day HR operational areas are highlighted in the guidelines, which will help the factory Operational or HR team to understand the day-to-day risk factors on their operations in the changing business environment. This is both due to COVID-19 and based on their learnings; the team will design further effective operational plans at their factories.

2.1. Establish a Crisis Management Team or Active Engagement of the Existing Team

We encourage factory management to establish a crisis management team including both workers and management representatives. The taskforce will have a limited number of members to reduce large gatherings and reflect the gender ratio in the factory. The factory may also choose to assign the COVID-19 crisis management responsibilities to an existing task force/team/committee. In all cases, the management will need to provide proper guidance and ensure the active engagement of the team.

Combination of the Team Members		
Department	Member	Suggested Total Number
Production	Senior Level Staff and Workers' Representatives	1-2
HR/Compliance		1-2 (BWB factory focal or nominated factory ambassador is encouraging to be the part of the committee member)
Admin (Security)		1
Medical and Health Facility		1
Worker Representative (Trade Union or Participation Committee Member)		2
Other Committee (if any)		2

The proposed team/committee or the existing committee should have proper Terms of Reference (TOR) defining clear work areas with the authority to make decisions based on the situations and implement them accordingly. The committee needs have direct access to the factory owners or senior management team, regardless of any constraining office protocol, until the pandemic situation is over.

The key tasks of the committee should be:

- Evaluate the overall factory operations and guide the senior management team on probable business, health and safety risks.
- Review the findings submitted by the other committees and/or assessment bodies to define a follow-up plan with the required logistics and support where necessary.
- Review the day-to-day factory operations, internal team reporting structure, BWB-OSH and Operational Work Checklists, existing risks and probable future risks. Adopt and suggest the best possible solutions or alternatives to the senior management team (Factory Owner/Chairman/Managing Director) accordingly.
- Review the factory's management system-related policies and procedures, welfare policies, existing working time adjustment, etc. to ensure necessary changes due to COVID-19 health and business continuity.
- Conduct regular follow-up, work progress meetings among the team members and other committee members, communicate the decisions, and work progress to the general workers in a regular manner.
- Review all the available guidelines received from Better Work, brand partners, employer associations, governments respective agencies, etc. and implement the most relevant guidelines in order to adjust with the new changing business environment.
- Regularly communicate, coordinate and follow-up with the local business community, required government agencies, worker's representatives, law enforcement members, medical facilities where necessary, in order to avoid any industrial disputes worker confusion, or safety and security hazards.

2.2. Establish Standard Operating Procedures (SOP) for Recruitment or Review the Existing SOP

Worker recruitment is a common practice in the industry. The factory has at least a minimum level of information and visibility of its existing workers. Such details are not available for the new workers or job candidates who will approach the factory for an interview, e.g. their previous health history, family members' health conditions, any isolation or quarantine records, etc. The recruitment team needs to record that health

information for everyone's health safety, including new workers or job candidates. The recruitment team and the factory management needs to consider individual health data as confidential and not use it for any form of discrimination at any time in the process. To ensure a minimum level of health safety, the factory may review the existing standard operating procedures or recruitment systems (interview to placement) and identify the probable risks factors. The factory may use any management system tools and techniques to identify the probable risk in the existing recruitment system and the best way to overcome the challenges.

2.3. Create General Awareness on Regular Operational Issues

As businesses reopen, it is unlikely for factories to function at full capacity. Factories need to identify a phased approach to return to work, select criteria for returning workers in a non-discriminatory way, and plan for shift work. The HR team needs to regularly update the workers and staff on all the COVID-19 related day-to-day operational changes in the factory. For example, general health advisories, safety and precautionary measures, procedures to enter and leave the factory, changing working time, shift work, leave policy, payment policy, self-quarantine and isolation policy, medical treatment and support policy, etc.

The HR team should encourage the workers' representatives to actively engage in all the regular awareness processes in the factory.

2.4. Identify High Risk/Vulnerable Risk Group

The COVID-19 crisis poses a serious health threat to everyone, but particularly for the senior citizen workers and those with other underlying health challenges such as diabetes, high blood pressure, and heart, lung and kidney problems. Factory management may identify vulnerable groups and develop policies to ensure special attention, provide required assistance and support, and ensure non-discrimination. Other vulnerable groups might be covered by these policies, such as pregnant workers, breastfeeding mothers and disabled workers. *Factories may use BWB Mothers@Work resources available through their respective advisor to properly deal with these concerns and ensure the proper hygiene of the childcare and medical facilities.*

In addition, the factory may introduce a one-pager Health Record Form either for all or for selected workers and staff. Existing medical staff can help the management team to design the form and select the target groups (sample copy attached as annexure-3). The objective of the form is to help each worker through health advisory and reduce the overall health risks to the individual, general workers and staff.

2.5. Precautionary Measure to Conduct Regular Fire Drill

The fire drill is a common practice in the industry that usually requires all workers to move and reach assembly points at the same time. Under the COVID-19 situation, it may pose a serious health threat to everyone. To overcome those challenges, the factory management team *may communicate with respective government agencies to get the proper guidelines and assistance if they want to conduct any fire drill under the COVID-19 situation.*

2.6. Training Plan

Generally, the factory has a number of in-house training plans in a year. Due to the new health challenges, the training team needs to redesign the participants' seating arrangement in a way that ensures physical distance. The training team is also encouraged to include COVID-19-related awareness information for all the training materials and session plans. It is also recommended to ensure that relevant participants are selected for each training with adequate gender balance, proper use of BWB training materials. Participants should disseminate the learnings with others in response to COVID-19.

In addition, line supervisors working directly with workers have a greater opportunity to observe their health conditions, particularly any kind of COVID-19-related symptoms. The factory training team needs to provide them in-house training on COVID-19 prevention and awareness so that they can monitor, assist and guide the workers properly.

Furthermore, the training team is also encouraged to cover new training areas on different work modalities and how to use technology during remote work if required.

2.7. Engage Worker Representatives

Consultation with workers' representatives in social dialogue is crucial in ensuring that the processes and activities related to COVID-19 awareness and monitoring are effective, inclusive, legitimate, and transparent. The factory needs to empower and engage worker representatives before their return to work, in addition to seeking their input throughout the different phases of business recovery.

Factory management needs to communicate with the entire workforce that they are free to share any concern, confusion with guidelines, doubts, etc. related to COVID-19 directly to the crisis committee members or any of the worker representatives of their choice.

2.8. Provide Health Guidelines

The factory HR team may share health guidelines and display flyers in the common locations e.g. the canteen, dining room, training room, wash rooms, etc. to create awareness among the workers and guide them on how they can strengthen their immune system naturally. The factory in-house medical practitioners may play a key role in preparing those health guidelines and flyers. Factory management may also open a small COVID-19 booth during the worker's lunch time at the dining area in order to respond to workers' questions, queries and confusion related to COVID-19.

2.9. Alternative Work Modalities

In case of any nationwide emergency or any particular urgency, the management team needs to design the clear guidelines and standard operating procedures (SOP) or evaluate its existing SOP for the staff and the workers who are eligible for alternative work modality or a business continuity plan under these particular situations. The management team needs to assess the capability of its existing logistics and the workforce skills, contact focal point. Management also may conduct awareness sessions about issues like working from home or remote work, uses of different technology, and limited operations as preparation and precautionary measures.

2.10. Conduct Regular Meetings

To conduct any kind of meeting with workers' representatives (trade union, participation committee, safety committee and other committees), production staff, meetings with external guests, or visitors, the factory management needs to establish clear guidelines on how they will conduct those meetings in response with COVID-19 challenges. For example, the frequency of the meetings, their duration, the seating arrangements, etc. should all be considered under the current circumstances, it is recommended to include regular COVID-19-related updates in all the meetings in order to create an awareness culture in the factory.

2.11. Protect Workers' Rights

The COVID-19 outbreak has created serious threats to the job market. According to the International Labour Organization (ILO), the COVID-19 impact could cause the equivalent of 400 million job losses across the globe. Due to this, volatile and insecure job market garment workers may be an easy target for exploitation in terms of sexual abuse, verbal abuse and forced labor. The factory's HR team needs to be more cautious and more visible on the production floor in order to ensure safety, security and required respect for the workers. The factory's existing Participation Committee (PC) members, other committee members, Trade Union (TU) representatives, administration and welfare officers may play a significant role through regular consultation, frequent floor visits and awareness sessions to ensure that the workers are not being exploited, due to this uncertain working environment.

2.12. Employee Travel Guideline

The HR team needs to design employees' domestic and international travel, self-quarantine and home isolation guidelines as per the Institute of Epidemiology, Disease Control and Research (IEDCR), Ministry of Health and World Health Organization (WHO) instructions in order to reduce the COVID-19 related health risks when travel is necessary.

2.13. Worker Payment

In the pandemic context, factories may review and adjust "production wages and targets" periodically. The HR team needs to adapt policies related to job security, paid leave, including sick leave, and provisions for workers' with family responsibilities, social security and factory loans. Such changes must be discussed with workers' representatives to avoid confusion and identify the best ways to implement them.

Most of the factories adopted different worker payment methodologies e.g. mobile financial systems (MFS) and bank account due to COVID-19 and accessing the government stimulus financial package. The HR team needs to communicate the factory's latest payment methodologies very clearly to the workers and guide them properly in terms of any difficulties.

2.14. Employee Job Protection

The HR team is encouraged to analyze its existing workforce, skills and workforce distribution more frequently than ever. The objective of the analysis should be focused on job protection of each individual through proper placement. It will help to increase the factory's overall production efficiency and employment protection.

2.15. Worker Grievance Management

Due to COVID-19 situations, different kinds of workers' grievances may raise due to different work modality, changing working time, priority working group selection, worker exposure, job insecurity, wage concerns, bonus, leave, and so forth. To address all the workers' grievances properly, the HR team needs to review the existing factory grievance submission process and communication system and make necessary adjustments accordingly.

The HR team needs to engage worker representatives to ensure the grievance mechanism is adapted or revised through proper social dialogue and consultation between management and the worker representatives.

2.16. Ensure Proper Documentation and Record Keeping

To adjust to the COVID-19 challenges, the factory may change and revise a number of its existing policies, procedures, and day-to-day worker welfare issues such as working time, leave, payment, grievances, overtime, floor layout, machine layout. All these changes should be documented and recorded to be transparent and properly comply with legal obligations to avoid any confusion or non-compliance.

2.17. Use Management System Tools and Techniques

The HR and Operational Teams are being encouraged to use globally proven management system tools and techniques such as PDCA (plan, do, check and act), Root Cause Analysis (RCA), and Priority Matrix (PM), SWOT (strength, weakness, opportunity, and threat) in order to identify and implement solutions for the factory and the workers. These tools and techniques will help the team to understand the underlying challenges and opportunities in response to COVID-19 business and operational challenges.

In addition, the HR and Operational Teams are being encouraged to use an operational checklist in response to COVID-19 (copy attached on how to use the checklist as Annexure-1 and the sample checklist as Annexure-2). The team may use this attached checklist or may customize it based on their work priorities and resources.

3. Conclusion Note

The HR guidelines are expected to help the RMG industry to cope with the COVID-19 challenges, reduce the business risks and return to work in the best possible ways. This HR guideline indicates that apart from OSH issues, the HR team needs to consider other operational risks as well to ensure a comprehensive action plan and make the business sustainable under the pandemic situations.

Information's sources links:

COVID-19 global updates: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

COVID-19 local updates: <https://www.iedcr.gov.bd/website/>

BWB OSH Guideline: <https://betterwork.org/where-we-work/bangladesh/>

Annexures:

1. How to use the Operational Work Checklist
2. Operational Work Checklist
3. Employee Health Record Form

Annexure 1.

How to Use the Operational Work Checklist:

The checklist will help the Operational Team and other existing committee members to understand and evaluate the ongoing key operational work issues in order to ensure an effective monitoring system for key work areas. It will help the team to determine the next required action in multiple areas in order to cope with the changing business environment under the COVID-19 pandemic situation. The management may revise this checklist based on their work needs, priorities, capacity, and resources.

- The factory management may use this checklist on a daily/weekly/monthly basis based on their resources, needs and work priorities.
- For each task name or task group, management needs to engage relevant officials or committee members to evaluate and monitor the ongoing work progress and status.
- The relevant officials or committee members will evaluate the task and based on the work progress, and they will mark either “YES/NO or In-Progress” as the status.
- If the task marked as NO or In-Progress, then the member may offer the reason using the management system tools such as Root Cause Analysis (RCA), PDCA (Plan-Do-Check-Act), Priority Matrix (PM) to determine the next required action/work plan, responsible person/team/committee members and target date with consultation from the respective officials.

- If the task is marked as YES, then the member may comment for further development on the progress under the Remarks Column or they may add Another Column.
- Based on the checklist outcomes, the factory senior management may determine their next course of action, as well as required department or official engagement.
- The factory senior management must communicate any decision or changes to all relevant parties using the most adequate communication channel available at the factory.

Annexure 2

Operational Work Check List in Response to COVID-19

Task Name	Work Status			Next Work Plan (if any)	Responsible Person/ Team	Target Date	Remarks
	Yes	No	In progress				
1.Policy and Procedures							
Has the factory reviewed the existing HR, OSH and Worker Welfare related policies and procedures in response to COVID-19 where necessary?							
Has the factory developed or updated HR, OSH and Worker Welfare related policies and procedures in response to COVID-19 where necessary?							
Has the factory used BWB-OSH guidelines and other guidelines regularly?							
Has the factory actively engaged and consulted with Worker Representatives while reviewing and developing any HR, OSH and Worker Welfare related policies and procedures?							

Has the factory communicated to the general workers on all the changes in response to COVID-19 through a notice board, a common facility, a PA system, worker representatives, etc.?							
2.Worker Common Welfare Facility and Issues							
Has the factory reviewed the existing Childcare Room, Canteen, Dining Room, Prayer Room, Medical Room, Training Room, etc. to identify the probable health risks and ensure all the necessary actions in response to COVID-19.?							
Has the factory identified high-risk groups as per the HR/Operational guideline and introduced the Employee Health History Record Form?							
Has the factory developed Health Guidelines for the employees in consultation with the existing medical staff ?							
Has the factory developed any travel guidelines?							
3.Working Time, Work Procedures and Workforce							
Has the factory changed working time, such as introducing new shifts, office timing, lunch time, etc. in response to COVID-19?							

Has the factory changed its existing floor layout and machine layout plan to ensure social distance in response to COVID-19?							
Has the factory operated the production process with fewer workers such as 30%, 50%, etc. of the total workforce to ensure social distance?							
Has the factory developed any alternative work modality or production plan in case of any emergency situation?							
Has the factory reduced its existing workforce through any form of separation due to new work modality and business challenges?							
Has the factory ensured all the proactive measures in order to limit unlawful worker exploitation due to current business environment and job insecurity?							
4. Leave							
Has the factory reviewed its existing leave policy, particularly focusing on COVID-19 practices such as isolation, self-quarantine, treatment time, etc.							
5.Training							
Has the factory developed or modified any training materials in response to COVID-19?							

Is factory conducting regular awareness sessions for general workers on COVID-19?							
Has the factory provided any COVID-19 awareness training to the floor production staff in order to regulate monitoring general workers' COVID-19-related symptoms? Is there protocol dictating what they need to do if they have symptoms?							
Is the factory conducting regular awareness sessions to the general workers on all the ongoing changes, such as health advisories, PPE, working time, leave, digital wage payment systems, etc. due to COVID-19?							
During any training and awareness session does the factory ensure proper social distance practices?							
Has the factory selected and nominated the training participants to ensure the proper gender balance, non-discrimination practices and best candidates.							
Do training participants disseminate the training learnings among general workers for their awareness ?							
6. Workers' Payment							
Has the factory paid all the workers' required payment in due time, including overtime, holiday work, worker separation, maternity leave, etc.?							
7. Record Keeping and Documentation							

Has the factory properly documented and recorded all the changes due to COVID-19 as well as other compliance issues, such as how many workers are in sick leave, casual leave, maternity leave, all the & machine lay out, policies, procedures, etc. on a daily basis?							
Has the factory properly documented, recorded and regularly tracked all COVID-19 positive patients (if any), deaths due to COVID-19 (if any), self-isolation and home quarantine records?							
Does the factory record all the grievance and discipline-related matters?							
6. Worker Representative Engagement							
Has the factory ensured proper worker representative engagement regarding all the COVID-19-related matters and documented properly?							
Have worker representatives received enough training on COVID-19 and shared their learnings with general workers?							
Has the factory shared all the operational changes in response to COVID-19 with worker representatives proactively?							

Has the factory properly addressed worker representative COVID-19-related concerns, suggestions and consulted with them accordingly?							
7. Others (Factory may add further information based on their need and priority)							

Employee Health Record Form

The objective of the health record is to identify the high-risk groups or vulnerable groups in order to ensure the proper attention and support to them and to reduce the health risk to individual and general workers during the COVID-19 situation.

Factory Name	
Employee Name	
Employees Address	
Employee Emergency Contact details with Phone Number	
Employee Job Title, Date of Joining, Date of Birth, Section, Line, etc.	
Employee pervious health record. Please note any underlying health condition such as blood pressure, diabetics, heart, hyper tension, kidney, liver, etc.	
Employee current health condition (if any ongoing health challenges)	

<p>Is the employee currently under any treatment and/or prescribed medication by a registered doctor?</p>	
<p>Does the employee need any special assistance from the organization? If so, please write details.</p>	
<p>Does the employer have any special plan for that employee because of underlying health challenges in regards to COVID-19? Please include details.</p>	
<p>Other note or comments (if any)</p>	

Interviewer Name and Signature

Medical Officer/ Staff Name and Signature

Employee Name and Signature

Disclaimer

These Guidelines are intended for informational purposes only, and should not be construed as legal advice. In addressing labour-related issues, it may be necessary to consult an expert such as a labour inspector, a lawyer, or a representative of your employers' association or union federation. The ILO and IFC shall not be held liable for any damage incurred as a consequence of reliance on these guidelines.