

Attachment 6

Shared protocol on measures to combat and contain the spread of the Covid-19 virus in the workplace between the Government its social partners.

24th April 2020

Today, Friday, 24th April 2020, the "*Shared protocol on measures to combat and contain the spread of the Covid-19 virus in the workplace*" signed on 14th March 2020 at the invitation of the President of the Council of Ministers, the Minister for the Economy, the Minister for Labour and Social Policy, the Minister of Economic Development and the Minister of Health, which had initiated the meeting between representatives of the social partners, to implement the measure contained in Article 1, paragraph 1, number 9), of the Prime Ministerial Decree of 11th March 2020, which - concerning both professional and manufacturing activities - recommends agreements between employers' and trade union organisations.

The Government favours, within its remit, the full implementation of this Protocol.

Premise

The document, taking into account the various measures adopted by the Government and, most recently, the Prime Minister's Decree of 10th April 2020, as well as those issued by the Ministry of Health, contains guidelines approved by all parties to assist companies in adopting anti-contagious safety protocols, i.e. regulatory protocols to combat and contain the spread of the COVID 19 virus in the workplace.

The carrying out of production activities can only take place under conditions that ensure adequate levels of protection for the workforce. Failure to implement the relevant protocols to ensure adequate levels of protection for the workforce will result in the suspension of the activity until the necessary safety conditions are met.

All parties agree, accordingly, to the possible use of social safety nets, with the consequent reduction or suspension of work, thus enabling companies in all sectors to implement these measures and to make their workplaces safe.

Along with the possibility for companies to use agile working practices, as well as social safety nets and extraordinary organisational solutions, all parties agree to encourage these measures to combat and contain the spread of the virus.

It is paramount to combine production activities with the guarantee of healthy and safe working environments and working methods. With this aim, it is envisaged that there will be a reduction or temporary suspension of activities.

With this in mind, the urgent measures that the Government intends to adopt, in particular in terms of social safety nets for the entire country, could prove beneficial regarding the reduction in the number of employee's who would be present in the workplace.

Without prejudice to the need to rapidly adopt regulatory protocols to combat and contain the spread of the virus, including procedures and rules of conduct, it will be necessary to encourage dialogue with trade union representatives within the workplace, and for small businesses, regional representatives provided by inter-confederal agreements, so that each measure adopted can be shared and made more effective by the contribution of experienced workers, in particular RLS and RLST, taking into account their specific production and regional situations.

SHARED REGULATORY PROTOCOL TO CONTAIN THE SPREAD OF COVID – 19

The purpose of this shared protocol is to provide operational guidance aimed at increasing the effectiveness of precautionary measures adopted to combat the COVID-19 epidemic in non-healthcare workplaces. COVID-19 represents a global biological threat, for which it is necessary to adopt the same measures for the whole country. This Protocol, therefore, contains measures which comply with a precautionary approach based on and following the instructions of the legislator and recommendations from the Health Authority.

Without limiting any obligations under the provisions issued relating of the containment of COVID-19 and provided by the Prime Ministerial Decree of March 2020 which requires compliance until 25th March 2020 with specific restrictive measures throughout the entire country in respect of manufacturing activities:

- companies to make maximum use of agile working methods for activities that can be carried out at home or a distance.
- paid holidays and paid leave for employees are to be encouraged, along with other instruments provided for by collective bargaining.
- company departments that are not essential to production are to be suspended.
- adopt anti-contagion safety procedures and, where it is not possible to respect the interpersonal distance of one metre as the principal containment measure, provide individual protection equipment at all times.
- encourage workplace sanitation procedures including the use of social safety nets for this purpose.
- for manufacturing activities only, it is also recommended that movements within the site should be limited as much as possible along with access to common areas.
- agreements between employers' and trade union organisations should be encouraged for manufacturing activities.
- for all non-suspended activities, agile working methods should be encouraged as much as possible.

it is hereby agreed that:

Companies shall adopt the following regulations within their workplaces, in addition to the above-mentioned regulations by applying the following additional precautionary measures - to be integrated with other equivalent or more effective ones depending on the specific features of their business and after consulting with the company's trade union representatives - to protect the health and safety of the workforce and ensure a healthy working environment.

1-INFORMATION

- Employing the most suitable and effective methods, companies shall inform all workers and those visiting the company about the requirements of the local authorities, by handing out and/or posting appropriate information packs at the entrance to the company's premises and at the most visible locations.
- In particular, information must refer to:
 - the obligation to stay at home if you have a temperature (over 37.5°) or other flu-like symptoms and to call their family doctor and the local health authority.
 - the knowledge and acceptance that they cannot enter or remain in the company and must declare immediately if, even after entry, symptoms occur (influenza, high temperature, coming from a risk area or having been in contact with people tested positive for the virus in the last 14 days, etc.) and that the official procedures require them to inform their family doctor and the local health authority and to remain at home.
 - a commitment to comply with all the instructions of both the authorities and the employer when

entering a company (in particular maintaining a safe distance, observing hand hygiene rules and adopting correct hygiene behaviours).

- the undertaking to inform their employer promptly and responsibly about any flu symptoms while carrying out your duties, taking care to stay at an appropriate distance from those people present.

The company shall provide adequate information based on duties and work situations, paying particular attention to the set of measures adopted with which employees must comply, in particular on the correct use of PPE to help prevent any possible form of infection spreading.

2- METHOD OF ENTRY INTO THE COMPANY

- Before entering a workplace, personnel may be required to undergo a body temperature test¹. If the temperature exceeds 37.5°, access to the workplace will not be permitted. People in such a condition, following the information given in the note, will be temporarily isolated and will not be allowed to go to the first aid station and/or to the infirmaries, but will have to contact their family doctor as soon as possible and follow their instructions.
- The employer must inform personnel in advance, as well as those who intend to enter the company, of the exclusion of access to those who, in the last 14 days, have had contact with people who were tested positive for COVID-19 or those who have come from at-risk areas according to WHO guidelines².
- For these cases, reference is made to Decree-Law No 6 of 23/02/2020, Article 1(h) and (i).
- Entering into a company for employees who have previously tested positive for COVID 19 infection must first be preceded by a medical certificate that shows that a swab test has been taken following the procedures laid down and issued by the relevant department of health prevention.

To prevent an outbreak in areas that are particularly affected by the virus, additional specific measures, such as the swabbing of workers, are available to the relevant health authorities, and the employer will provide full cooperation where appropriate.

¹ The real time body temperature recording constitutes a processing of personal data and, therefore, must take place in accordance with the privacy regulations in force such as: 1) take the temperature but do not record it. It is only possible to identify the person concerned and record that the temperature threshold has been exceeded if it is necessary to document the reasons that prevented access to the company premises; 2) provide information on the processing of personal data. Please note that the information sheet may leave out information already in the data subject's possession and may also be provided orally. With regard to the contents of the information note, with reference to the purpose of the processing, the prevention of contagion from COVID-19 may be stated, and with reference to the legal basis, the implementation of the anti-contagion security protocols in accordance with art. 1, no. i, letter d) of the Prime Ministerial Decree of 11th March 2020 may be noted, and with reference to the duration of any storage of data, it is possible to refer to the end of the state of emergency; 3) establish the appropriate security and organisational measures to protect the personal data. From an organisational point of view, it is necessary to identify the persons in charge of processing the data and provide them with the necessary instructions. To this end, it should be remembered that the data may only be processed for purposes of prevention from COVID-19 contagion and must not be disclosed or communicated to third parties outside of the specific regulatory requirements (e.g., should a request be made by the Health Authority in order to identify any "close contacts" of a worker who has tested positive for COVID-19); 4) in case of temporary isolation due to exceeding the temperature threshold, ensure procedures are in place to guarantee confidentiality and dignity of the worker. These guarantees must also be provided in the event that the worker informs the personnel office that he or she has had, outside of the company, contact with people who tested positive for COVID-19 and in cases where another employee who developed a fever and respiratory symptoms while working was removed.

² If a declaration is required stating that they have not come from a risk area and that they have not been in contact in the last 14 days with individuals who have tested positive for COVID-19, you must observe the rules on the processing of personal data, as the collection of this declaration constitutes data processing. Therefore, the information referred to in footnote 1 above applies and we suggest that only necessary information that is appropriate and relevant to the prevention of infection with COVID-19 is collected. For example, if a statement concerning contact with persons found to be COVID-19 positive is required, additional information about that person should not be requested. Or, if a statement is needed regarding coming from a risk area, do not ask for additional location information.

3- METHODS OF ACCESS FOR EXTERNAL SUPPLIERS

- For external suppliers' access, determine the entry, transit and exit procedures using defined routes, procedures and timeframes to reduce the chances of contact with personnel in the departments/offices involved.
- If possible, delivery drivers must remain onboard their vehicles: access to offices is strictly forbidden at all times. When carrying out necessary loading and unloading activities, the haulier must observe at least one-metre distance.
- For suppliers/transporters and/or other external personnel, identify/install dedicated toilets, prohibit the use of employee toilets and ensure adequate daily cleaning.
- Access to visitors must be reduced as much as possible; if external visitors (cleaning, maintenance, etc.) are required, they must be subject to all company rules, including those for access to company premises referred to in paragraph 2 above.
- Where there is a transportation service that has been organised by the company, the safety of its employees must be guaranteed and respected during each trip.
- The regulations laid down in this Protocol also apply to companies under contract, which can set up either permanent or temporary locations or construction sites within the manufacturing sites or areas.
- In the case of workers employed by subcontractors operating at the same manufacturing plant (e.g. maintenance workers, suppliers, cleaners or security staff) who have tested positive for COVID-19, the contractor must immediately inform the client and both parties must cooperate with the local health authority by providing useful information to identify any potential close contacts.
- The client company is also required to provide the contractor with full information on the contents of the company protocol and to ensure that the workers of the contractor or third party companies operating in any capacity within the company perimeter fully comply with its instructions.

4- CLEANING AND SANITATION OF THE PREMISES

- The company is responsible for the daily cleaning and periodic sanitisation of the premises, rooms, workstations, communal areas as well as leisure facilities.
- If a person with COVID-19 has been present inside the company premises, the cleaning and sanitation of the above-mentioned premises shall be carried out in line with the provisions of Circular no. 5443 of 22nd February 2020 issued by the Ministry of Health as well as its ventilation.
- End of shift cleaning and periodic sanitisation of keyboards, touch screens and mice using appropriate detergents, both in offices and production departments, must take place.
- The company, in line with the instructions issued by the Ministry of Health and in a manner deemed most appropriate, may organise specific operations/cleaning schedules by using the social safety nets available (also by way of derogation).
- In the most widespread endemic areas or in companies where there have been suspected cases of COVID-19, in addition to normal cleaning activities, it will be necessary to provide, upon reopening, non-routine sanitisation of rooms, workstations and common areas, following Circular 5443 of 22nd February 2020.

5- PERSONAL HYGIENE MEASURES

- People who are present on the premises must take all the necessary hygienic precautions, in particular concerning the hands.
- The company provides suitable hand cleansing agents.
- Frequent cleaning of hands with soap and water is recommended.
- Hand cleansers mentioned above must be accessible to all personnel through specific dispensers located in easily identifiable places.

6- PERSONAL PROTECTIVE EQUIPMENT

- The introduction of hygiene measures and personal protective equipment specified in this Regulatory Protocol is essential and, given the current emergency, is linked to its availability on the market. For these reasons:
 - a. Masks shall be used following the World Health Organisation guidelines.
 - b. Given the emergency, in the event of supply difficulties and for the sole purpose of preventing the spread of the virus, masks of the types indicated by the health authority may also be used.
 - c. The preparation by the company of liquid detergent according to WHO guidelines are encouraged.
[https://www.who.int/gpsc/5may/Guide to Local Production.pdf](https://www.who.int/gpsc/5may/Guide%20to%20Local%20Production.pdf)
- If the job involves working at a distance of less than one metre and no other organisational solutions are possible, masks and other protective equipment (gloves, glasses, overalls, earmuffs, gowns, etc.) that meet the standards laid down by the relevant scientific and health authorities must be used.
- In adopting the measures of the Protocol within the workplace based on the overall risks assessed and, starting from the mapping of the different activities of the company, the appropriate PPE must be used. It is envisaged that all workers who share common areas will use a surgical mask, as is required by DL n. 9 (art. 34) in conjunction with DL n. 18 (art. 16 c. 1).

7.- MANAGEMENT OF COMMON AREAS (CANTEEN, CHANGING ROOMS, SMOKING AREAS, DRINKS AND/OR SNACK DISPENSERS, ETC.).

- Access to common areas, including company canteens, smoking areas and changing rooms must be restricted, ensuring continuous ventilation of the premises, reducing the time spent inside these areas and maintaining a safe distance of 1 metre between the people using them.
- It is necessary to organise changing facilities and locker room sanitisation to provide employees with places to store their work clothes and to guarantee suitable hygienic and sanitary conditions.
- It is also necessary to ensure periodic sanitisation and daily cleaning of these areas, using special detergents in the canteen and on the keyboards of both drink and snack dispensers.

8- COMPANY ORGANISATION (ROSTERING, TRAVEL AND SMART WORKING, RE-SHAPING PRODUCTION LEVELS)

Concerning the Prime Ministerial Decree of 11th March 2020, point 7 of which is applicable only during the current COVID-19 emergency period, companies may, based on the national collective bargaining agreements, facilitate arrangements with the company's trade union representatives:

- Order the closure of any department other than manufacturing or, at least, those of which it is possible to operate through smart working, or remotely.
- A realignment of production levels may be carried out.
- Ensure a shift plan for employees who are assigned to production to reduce as much contact as possible and create autonomous, separate and distinct teams.
- Use smart working for all those activities that can be carried out at home or remotely if social safety nets are used, also without exception, to make sure that they cover the entire company structure and, if necessary, with appropriate shifts.
- To use, as a priority, the social safety nets that are available in respect of the contractual institutions (par, rol, banked hours), usually designed to allow individuals to stay off work without loss of pay.

- If the use of the institution funds referred to in the third point is not sufficient, any outstanding holiday leave not yet taken will be used
- All national and international travel/business trips, even if previously agreed or organised, are suspended and cancelled.

Remote working continues to be favoured, even during the gradual re-activation of activities due to it being a useful and flexible prevention tool, without compromising the need for the employer to guarantee adequate support conditions for the worker and their activities (assistance in the use of equipment, flexibility in working time and breaks).

It is essential to always respect social distancing, especially when re-designing workspaces in line with the production processes and company areas. In the case of workers who do not need special tools and/or work equipment and who can work by themselves, they should, for this transitional period, be positioned in spaces gained for example from unused offices or meeting rooms.

For areas where several employees work in the same place and at the same time, innovative solutions must be found, for example, the repositioning of workstations that are spaced sufficiently apart from each other or comparable solutions.

Work schedules should be redefined with flexible working hours that favour social distancing and therefore reducing the number of employees simultaneously working at the same time and avoiding the number of people both entering and leaving the workplace at the same time.

It is essential to avoid social gatherings, especially when travelling to and from work (*commuting*), in particular when using public transport. For this reason, it is necessary to encourage forms of transportation to the workplace that provides sufficient distance between travellers and encourages the use of private transport or shuttles.

9- MANAGEMENT OF EMPLOYEE ENTRY AND EXIT POINTS

- The staggering of entry/exit times is encouraged to avoid as much contact as possible in common areas (entrances, changing rooms, canteen etc.).
- Where possible, there should be an entrance door and an exit door from the premises along with the presence of suitable detergents labelled with appropriate instructions.

10- MOVEMENT, INTERNAL MEETINGS, IN-HOUSE EVENTS AND TRAINING

- Movements within the company site must be limited to the minimum necessary and in compliance with the company's instructions.
- Meetings in attendance are not permitted. If they are necessary and urgent and cannot be carried out remotely, the attendance must be reduced to a minimum and, in all cases, inter-personal distancing and adequate cleaning/sanitising of the premises must be guaranteed.
- All internal events and training activities in a classroom setting, even if previously arranged, must be suspended or cancelled; it is, however possible, if the company organisation allows it, to carry out distance learning even for those working remotely.
- Failure to complete the updating of professional and/or qualifying training within the deadlines set out for all company roles/functions in terms of health and safety in the workplace and which is caused by the ongoing emergency and therefore due to circumstances beyond the company's control does not imply the impossibility of continuing to carry out specific roles/functions. (By way of example: the emergency worker, whether fire-fighting or first aid, may continue to intervene in case of need; the forklift truck driver may continue to work as a forklift truck driver)

11- MANAGEMENT OF ASYMPTOMATIC PEOPLE IN THE COMPANY

- If a person on the premises develops a fever and symptoms of a respiratory infection such as coughing, he must immediately report this to the personnel office and his isolation must be carried out following the provisions of the health authority and that of others present on the premises. The company must then immediately inform the relevant health authorities via the COVID-19 emergency numbers provided by the Region or the Ministry of Health.
- The company will work with the local health authorities to define any "close contacts" the person found positive with COVID-19 may have had in the company. This is to enable the authorities to apply the necessary and appropriate quarantine measures. During the investigation period, the company may ask any possible close contacts to leave the plant as a precautionary measure and as indicated by the health authority.
- The employee at the time of isolation must be equipped immediately with a surgical mask if he or she is not already wearing one.

12- HEALTH CHECKS/COMPANY DOCTORS/RLS

- Health checks must continue to take place according to the measures set out in the Ministry of Health's instructions (so-called decalogue).
- During this period, priority should be given to preventive visits, on-demand visits and visits following return from illness.
- Periodic health checks should not be stopped since they are an additional preventive measure of a general nature: they can intercept possible cases and suspicious symptoms of contagion and the information and training that a company doctor can provide to workers to prevent the spread of contagion.
- In implementing and proposing all regulatory measures related to COVID-19, the company doctor will cooperate with both employers and RLS/RLST.
- The company doctor will report situations of particular vulnerability as well as current or past illnesses of employees to the company while the company will ensure their rights and privacy is protected.
- The company's doctor will also apply recommendations from the local health authorities. Given his/her role in risk assessment and health monitoring, the doctor may suggest adopting any means of diagnosis if deemed useful to contain the spread of the virus and safeguard the health of workers.
- When their activities are resumed, the doctor responsible for identifying individuals with particularly vulnerable situations and the reintegration into work of individuals with previous COVID 19 infection should be involved.

It is recommended that health checks should particularly focus on vulnerable people, especially concerning their age.

For the gradual integration of workers after suffering from COVID19 infection, the appointed company doctor, upon presentation of certification that the swab test, tested negative according to the procedures laid down and issued by the relevant regional health department, carries out a medical examination before the resumption of work, following an absence for health reasons lasting more than sixty days continuously, to verify suitability for the job. (Legislative Decree 81/08 and successive amendments and additions, art. 41, paragraph 2, letter e-ter),- also to assess specific risk factors irrespective of the length of absence due to illness.

13- UPDATING OF THE REGULATORY PROTOCOLS

- A Committee is to be set up in the company for the implementation and verification of the rules contained in the protocol and is to include the company's trade union representatives and the RLS.
- In cases where, due to the particular type of company and trade union relations system, no company

committee can be set up, a Regional Committee made up of the Joint Health and Safety Bodies, where established, will be set up with the participation of RLST and representatives of Social Partners.

- Committees for this Protocol may be set up, at either regional or sectoral levels, on the initiative of the signatories to this Protocol, together with the involvement of the local health authorities and other institutional bodies involved in initiatives to combat the spread of COVID 19.