

**Dear Sirs,**

We are pleased to share with you the June issue of *HR Perspectives*.

An increasing number of employees have recently decided about at least partial return of employees to offices and workplaces. However, the **exceptional circumstances** cause that employers introduce **exceptional solutions** to adapt the work process to the current situation - especially in terms of **health and safety at work**. The Ministry of Development and the Chief Sanitary Inspectorate have issued '*Guidelines for the organisation of office work during the SARS-CoV-2 epidemic in Poland*'.

In this issue of HR Perspectives we advise on how to implement these guidelines into practice. Introducing the **tailor-made** work organisation procedures will help to **manage employer risk** and make employees feel more comfortable, which, in turn, should have a positive impact on the **compliance** with new workplace rules.

**We hope you find it interesting!**

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### **Talking company secrets by open doors?**

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The guidelines issued by the Ministry and the Chief Sanitary Inspectorate make it clear that both internal and external meetings, if unavoidable, should be as short as possible and conducted with windows or doors open.

However, not every meeting can take place under such conditions. Meetings during which issues related to information constituting the company secret or other sensitive information that may expose the employer to harm, negotiations with trade unions or meetings re: termination of employment contracts should definitely take place under conditions that guarantee confidentiality.

A necessity of such meetings is quite another matter. Many meetings likesome trade union meetings or social labour inspections, etc., can be avoided, as there are reasonable grounds to refuse meeting with employees.

### **Alternate remote working – beware of discrimination claims!**

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According to the guidelines, the employer should strive to organize the work process in such a way that employees can perform their duties remotely. Such actions are aimed at preventing large numbers of people from gathering in the workplace at the same time.

Some employers are considering introducing alternate remote work (e.g. employees work a part of the month in the office, the other part at home). Others recommend remote work only for certain groups of employees. However, when giving this possibility to particular employees and refusing others, the employer should keep in mind the principle of equal treatment in employment. A decision like this should be based on objective criteria that can be demonstrated in case of employee lawsuits. It does not mean that all employees performing similar duties must have the same access to remote working opportunities. It may differ, if objectively justified. For example, it makes more sense from a business and organisation perspective to enable remote work for employees who work in international teams, scattered around the world, than for those working in teams located in one place.

### **An employee with a suspicion of coronavirus - what should the employer do?**

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Not long ago, the possibility of separating an employee suspected of coronavirus from the rest of the team by an employer was the subject of a heated debate. In the commented Guidelines, it was clearly indicated that when an employee has disturbing symptoms suggesting coronavirus infection, they should be immediately move away from work and sent home by individual transport. While awaiting the transport, the employee should be sent to a designated room, isolated from other people.

If possible, the employer should designate such a room before the need arises. This issue may also be settled by the internal regulations introduced in connection with the current situation.

### **Internal procedures, training, risk reassessment**

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Both the content of the Guidelines and the nature of the recommendations for employers indicate that working conditions will change significantly in the post-COVID era. It means a new situation not only for employers, but especially for employees who have to learn to function in the new conditions.

It may be helpful to introduce an internal procedure to put in order all the work rules and emergency protocols. Firstly, such a procedure helps to enforce performance of individual duties and compliance with the established rules. Secondly, it gives employees a sense of safety and comfort resulting from clearly defined working conditions as well as health and safety-related requirements and obligations. It is worthwhile to train your employees in this regard and address any questions and doubts that may arise.

Furthermore, it may be necessary to reassess occupational risk. This applies primarily to jobs with high exposure to the risk of coronavirus infection, but also to those where employee obligations regarding health and safety at work have significantly changed (due to the new requirements).

### **Guidelines for office work during the SARS-CoV-2 pandemic in Poland**

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On 12 June 2020 The Ministry of Development and the Chief Sanitary Inspectorate issued guidelines on how to organize office work during the epidemic to increase the employee safety and minimize infection risk at the workplace. The guidelines are as follows:

#### **Ensuring employee safety**

1. Inform your employers that if they experience symptoms of SARS-CoV-2 or other infectious disease they should not come to work but stay at home and contact a doctor.
2. Ensure that a safe distance of 1.5 meters is maintained.
3. If unavoidable, keep internal and external meetings as short as possible, with windows or doors open. Employees and customers/contractors should maintain a safe distance of minimum 2 m.
4. Provide employees with personal protective equipment (masks, disposable gloves, etc.) or hand disinfectants.
5. Disinfect common areas, as well as phones/door phones/walkie-talkies/digital panels (e.g. in microwaves, coffee makers) every day.
6. Raise awareness of good hygienic practices during pandemic, in particular washing and disinfecting hands regularly.
7. Encourage the use of disposable tableware which should be safely binned after the meal.

### Ensuring office safety

1. Place hand sanitizer dispensers within the entrance, exit and break room areas.
2. If possible, rotate employee shifts to reduce the number of employees working on-site at the same time, so that people sitting in close proximity could move around each other in specific time intervals (though remote working, if possible, or alternating employee shifts to reduce contact is recommended).
3. Use floor signage to help people maintain social distancing in common areas such as lift lobbies, lifts, building entrance areas, dining rooms and kitchens.
4. Place instructions for hand washing and sanitizing near sinks and washbasins.
5. Wherever possible, encourage communication by mobile phones, e-mails, messaging applications or radio.
6. Reduce the number of employees using common areas at the same time (e.g. by staggering meal breaks and arrival times).
7. Limit the number of people allowed in break rooms (kitchens) at the same time and sanitize surfaces and devices used there – an employee who intend to use it should sanitize it beforehand, i.e. wipe the table top, the back of the chair, the buttons of the household appliances with a disinfectant agent.
8. Wash dishes in a dishwasher at a temperature of at least 60°C or use personal cutlery, cups and plates.
9. Make sure that break rooms and toilets are cleaned frequently, and often sanitize lift buttons, door handles, light switches and other frequently touched and commonly used surfaces or equipment.
10. Disinfect hands before and after using the shared office equipment, such as printers, MFPs, shredders, touch control panels, etc.
11. Determine the number of people allowed in the lift (a maximum number of people divided by 3) and provide this information at the entrance.
12. Only outsiders and contractors as well as employees who come into contact therewith need to wear masks covering mouth and nose in the office.
13. Ventilate rooms whenever possible. Do not use mechanical ventilation with heat recovery - recuperation.

### Guidelines for employees

1. You should be informed by your Employer that if you experience any symptoms of the disease or come into contact with a person who showed visible symptoms of the disease or has come into a contact with an infected, isolated or quarantined person, you should not come to work but follow the guidelines issued by the health and sanitation authorities.
2. Disinfect hands upon arrival, before you start working.
3. Keep a safe distance from colleagues and people you talk to - at least 1.5 meters.
4. Wash hands frequently and thoroughly with soap and water according to the instructions placed by the sink. Disinfect dry hands with an alcohol-based agent (min. 60%).
5. Cough or sneeze into a tissue or into your arm, then wash your hands.
6. Avoid touching your face, especially mouth, nose and eyes.

Make sure that workstations are clean and hygienic, especially after the working day is over. Remember to disinfect any frequently touched surfaces, such as phone handsets, keyboards and mouse, light switches or desks. A "clean desk policy" is recommended for this purpose.

#### **Preventive procedures: suspected coronavirus infection among employees**

1. Follow the information provided by the Chief Sanitary Inspector and the Minister of Health, available at [gis.gov.pl](https://gis.gov.pl) or <https://www.gov.pl/web/koronawirus/>, as well as the applicable provisions of law.
2. If any employee at the workplace exhibits distressing symptoms suggesting coronavirus infection, remove such a symptomatic employee from work immediately and send him/her home by individual transport. Notify the relevant District Sanitary and Epidemiological Station and comply strictly with the directions and requests they provide.
3. Designate a room where the employee can wait for transport in isolation from other people.
4. Establish where the employee has stayed or moved around and clean those areas according to the workplace procedures; disinfect frequently touched surfaces (door and furniture handles, railings, etc.).
5. Follow the guidelines of the State District Sanitary Inspectorate to establish whether this case requires implementing further procedures.

#### **Safety procedures: suspected coronavirus infection in a person/client/contractor/supplier etc.**

1. Draw up lists of employees, customers and other persons present at the workplace at the time of contact and follow the directions of The Chief Sanitary Inspector available at [gov.pl/web/koronawirus/](https://gov.pl/web/koronawirus/) and [gis.gov.pl](https://gis.gov.pl) applicable to people who came into contact with an infected person.
2. Disinfect thoroughly the area where the infected person stayed (even if it is not certain whether that person had already been infected at the time the contact was made) and all the instruments and devices that were used by the infected person.