**Effective Infection Control Practices and Policies
for Operating Apparel and Textile Factories**

**Worker Rights Consortium and
Maquiladora Health & Safety Support Network
April 2020**

The following guidelines relate to the safe operation of apparel and textile factories during the Covid-19 pandemic. The recommendations do not address the requirements of commercial contracts or the national labor laws and international standards beyond occupational health and safety (OHS). It goes without saying that if pandemic conditions in the locations of apparel and textile facilities imperil the health and threaten the lives of factory workers, the facilities should cease operations immediately and follow appropriate public health instructions.

The guidelines have two sections: one for facilities outside the United States and the other for facilities within the United States. Each section consists of immediate work practices needed to protect workers from infection on site and the new and revised workplace policies necessary to implement the infection control measures in an effective and sustainable manner.

Factories in both the global apparel supply chain and the domestic garment industry in the United States vary tremendously in their size, internal physical environment, immediate surroundings, production operations, workforce composition, and management. For that reason, certain policies and practices will be more critical to adopt and/or more feasible to implement in some circumstances than in others. However, ensuring the safety and health of the workforce must be the top priority, and the direct participation of workers and their representatives in the development, implementation, and verification of effective infection control programs at the factory level is essential.

For additional information, contact the Worker Rights Consortium (wrc@workersrights.org) and Garrett Brown (garrettdbrown@comcast.net) at the Maquiladora Health & Safety Support Network.

For Apparel and Textile Factories outside the United States

Immediate On-site Work Practices

- Establish, consistent with the recommendations found below under "Workplace Policies to Guide On-site Work Practices", an official Infection Control Committee and a written Infection Control Program for the factory;
- Depending on the size of the facility, assign a member of the factory's Infection Control Committee for each department or distinct work area whose primary work responsibility will be the effective implementation of the factory's Infection Control Program and will receive their regular average wages for time spent carrying out these responsibilities;
- Establish a schedule of regular meetings for the facility-wide and department/work area-level Infection Control Committee members to coordinate and evaluate program activities;
- Establish restrictions on entry into the facility by guests and all non-essential personnel (recognizing that representatives of buyers and their auditors, independent factory monitors and government inspectors are essential personnel);
- Develop and establish procedures, for effective infection control (disinfection, masking, and distancing) in transportation arranged, provided, and/or subsidized by the factory for workers traveling to and/or from the facility;
- Establish an effective method to ascertain the health statuses of workers in every department, such as daily temperature readings by supervisors or Infection Control Committee members and verbal confirmation of health status from each worker;
  - Enroll employees in government infection testing programs and enable them to be tested according to government schedules and policies;
  - Prepare a quarantine room or area for holding employees who are being referred from the facility to a medical facility or sent home;
- Establish a policy of providing paid sick leave for the full period established by relevant public health authorities to any employee with a positive test, exhibiting symptoms, and/or employees caring for ill family members;
- Establish all measures recommended by authoritative sources for protecting healthcare workers in any factory health clinic and for maintaining these clinics free from infection;
- Establish increased infection prevention protocols for factory food service workers, facilities and equipment, and meals;
- Develop and establish policies and practices for effective infection control (surveillance, disinfection, and distancing) in dormitories and/or other lodging or resting areas provided, arranged, and/or subsidized by the factory;
- Establish an effective protocol for ongoing disinfection of the work site;
  - Ensure that conventional housekeeping activities continue;
  - Relieve one or more production workers (at their regular pay) to systematically disinfect surfaces throughout the work shift that are potentially contaminated with the Covid-19 virus, such as door knobs, hand rails, machinery and controls, tools and equipment, horizontal work surfaces, and common areas where transmission of the virus may occur;
  - Increase the number and locations of handwashing facilities, provide all employees with access to soap and water for handwashing, and allow paid time

for employees to wash their hands at the start of the work shift and periodically throughout the work shift; hand sanitizers can be used in lieu of soap and water;
- o Provide disinfecting wipes and no-touch disposal to employees for periodically disinfecting their workstation and adjacent areas;
- Establish an effective protocol for additional disinfection of the work equipment and areas of employees who are medically removed from the work site;
- Establish procedures for increasing the physical distancing of employees in their workstations and work areas, and other factory premises such as:
  - o Maintaining a six-foot/two-meter distance between workstations;
  - o Installing barriers, such as washable plexiglass, between workstations;
  - o Implementing staggered work shifts or flexible hours;
  - o Implementing staggered meal and rest breaks;
  - o Implementing infection control measures (disinfection and distancing) in factory canteens and at factory-provided food stalls;
- Provide appropriate personal protective equipment (PPE) but only if any such PPE provides an effective barrier to infection and does not replace/distract from other effective infection control measures (such as surveillance, disinfection, and distancing);
- Ensure that any heating, ventilation, and air conditioning (HVAC) system on site runs in 100 percent exhaust mode, meaning no recirculation of air within the structure;
- Establish a training and education program to be conducted on paid work time for all production and maintenance workers, and for the supervisors and managers directing these workers, including:
  - o The modes of transmission, symptoms, and adverse health effects of the Covid-19 virus;
  - o The means to prevent infection of the Covid-19 virus;
  - o Specific training for employees assigned to housekeeping and disinfection duties on biohazard prevention and the hazards of cleaning chemicals and procedures;
  - o The elements of the facility's Infection Control Program;
  - o Their specific responsibilities under the Infection Control Program;
  - o Training can be done in-person, through videos, and/or written materials (such as wall posters and information cards) and must be conducted in the language(s) spoken by employees.

New and Revised Workplace Policies to Guide On-site Work Practices

- Develop and implement a comprehensive workplace Infection Control Program;
  - o Review any national guidelines for OHS measures to be adopted during the pandemic;
  - o Develop and implement a written program with key elements based on authoritative public health guidelines (WHO, national health department, etc.);
    - Risk assessment and identification of all potential sources of infection;
    - Medical surveillance based on daily checks;
    - Medical removal policies for employees exhibiting symptoms;
    - Infection control and decontamination measures;
    - Training and education (managers, supervisors, and hourly employees);

- - Basic recordkeeping of the activities and results of the program;
    - Obtain the active participation of the workforce and their representatives, including, specifically, any trade unions present in the factory, in the development and implementation of the Infection Control Program;
    - Designate an Infection Control Officer for each facility;
    - Create an Infection Control Committee, depending on the size of the facility, large enough to effectively implement the Control Program in each department or work area, and, in the case of large factories, with members assigned to carry out Infection Control measures as their primary work responsiblity;
    - Establish a proactive public information strategy to provide accurate information and counteract false or misleading information;
- Establish a policy of providing paid sick leave to ill individuals;
- Establish a paid leave program which prohibits discrimination or any punitive impact on employees on leave:
    - For employees with a positive test, exhibiting symptoms, or being ill;
    - For employees caring for ill family members;
    - For vulnerable employees, including those over 60, immune-compromised, and/or pregnant;
    - For employees quarantined due to potential exposure to Covid-19 (e.g., via relatives or friends who are ill or presence in or travel to "viral hotspots");
- Recognize employees' right to express concerns about workplace safety, and their right to refuse unsafe work without dismissal or discrimination, and provide mechanisms for workers to express such concerns confidentially and/or anonymously if they so choose;
- Register the workplace with national government social security and health agencies implementing emergency financial and healthcare programs in response to the Covid-19 pandemic, including testing and treatment of the disease;
    - Enroll employees in such programs, so that employees on medical removal can receive necessary medical treatment and social support, and provide employees with documentation of their enrollment;
    - Ensure that the factory will pay for necessary medical testing and treatment in the event of delays in government programs;
- Cross train employees in anticipation of critical employees becoming ill;
- Develop a plan for an orderly shutdown of the facility if a spike in infection rates prohibits further operations to ensure:
    - A safe shutdown of production operations;
    - Enrollment of all affected employees, including foreign-born migrant workers, and into emergency national health and social welfare programs (or equivalent assistance, in the case of foreign migrant workers, if they are ineligible for such national programs).

For Apparel and Textile Factories inside the United States

Immediate On-site Work Practices

- Establish, consistent with the recommendations found below under "Workplace Policies to Guide On-site Work Practices", an official Infection Control Committee and a written Infection Control Program for the factory;
- Depending on the size of the facility, assign a member of the factory's Infection Control Committee for each department or distinct work area whose primary work responsibility will be the effective implementation of the factory's Infection Control Program and will receive their regular average wages for time spent carrying out these responsibilities;
- Establish a schedule of regular meetings for the facility-wide and department/work area-level Infection Control Committee members to coordinate and evaluate program activities;
- Establish restrictions on entry into the facility by guests and all non-essential personnel (recognizing that representatives of buyers and their auditors, independent factory monitors and government inspectors are essential personnel);
- Develop and establish procedures for effective infection control (disinfection, masking, and distancing) in transportation that is provided, arranged, and/or subsidized by the factory for workers traveling to and from the facility;
- Establish an effective method to ascertain the health statuses of workers in every department, such as daily temperature readings by supervisors or Infection Control Committee members and verbal confirmation of health status from each worker;
  - Enroll employees in government infection testing programs and enable them to be tested according to government schedules and policies;
  - Prepare a quarantine room or area for holding employees who are being referred from the facility to a medical facility or sent home;
- Establish a policy of paid sick leave for the full period established by relevant public health authorities for any employee with a positive test, exhibiting symptoms, and/or employees caring for ill family members;
- Establish all measures recommended by authoritative sources for protecting healthcare workers in any factory health clinic and for maintaining these clinics free from infection;
- Establish increased infection prevention protocols for factory food service workers, facilities and equipment, and meals;
- Establish an effective protocol for ongoing disinfection of the work site:
  - Ensure that conventional housekeeping activities continue;
  - Relieve one or more production workers (at their regular pay) to systematically disinfect surfaces throughout the work shift that are potentially contaminated with the Covid-19 virus, such as door knobs, hand rails, machinery and controls, tools and equipment, horizontal work surfaces, and common areas where transmission of the virus may occur;
  - Increase the number and locations of handwashing facilities, provide all employees with access to soap and water for handwashing, and allow paid time for employees to wash their hands at the start of the work shift and periodically throughout the work shift; hand sanitizers can be used in lieu of soap and water;

- o Provide disinfecting wipes and no-touch disposal to employees for periodically disinfecting their workstation and adjacent areas;
- Establish an effective protocol for additional disinfection of the work equipment and areas of employees who are medically removed from the work site;
- Establish procedures for increasing the physical distancing of employees in their workstations and work areas, such as:
  - o Maintaining a six-foot/two-meter distance between workstations;
  - o Installing barriers, such as washable plexiglass, between workstations;
  - o Implementing staggered work shifts or flexible hours;
  - o Implementing staggered meal and rest breaks;
  - o Implementing infection control measures (disinfection and distancing) in factory canteens, break or rest areas, and/or at factory-provided, arranged, or subsidized food providers;
- Provide appropriate personal protective equipment (PPE) but only if any such PPE provides an effective barrier to infection and does not replace other effective infection control measures (such as surveillance, disinfection, and distancing);
- Ensure that any heating, ventilation, and air conditioning (HVAC) system on site runs in 100 percent exhaust mode, meaning no recirculation of air within the structure;
- Establish a training and education program to be conducted on paid work time for all production and maintenance workers, and for the supervisors and managers directing these workers, including:
  - o The modes of transmission, symptoms, and adverse health effects of the Covid-19 virus;
  - o The means to prevent infection of the Covid-19 virus;
  - o Specific training for employees assigned to housekeeping and disinfection duties on biohazard prevention and the hazards of cleaning chemicals and procedures;
  - o The elements of the facility's Infection Control Program;
  - o Their specific responsibilities under the Infection Control Program;
  - o Training can be done in-person, through videos, and/or written materials (such as wall posters and information cards) and must be conducted in the language(s) spoken by employees.

New and Revised Workplace Policies to Guide On-site Work Practices

- Develop and implement a comprehensive Workplace Infection Control Program;
  - o Recognize and implement the employer's responsibility to identify and control all workplace hazards, including biohazards, as per the "general duty clause" of the Federal Occupational Safety and Health Administration (OSHA), the "Injury and Illness Prevention Program requirements" of the California Division of OSHA (Cal/OSHA), and similar requirements of other state OSHA programs;
  - o Develop and implement a written program with key elements based on authoritative public health guidelines (such as the CDC and state health departments, etc.);
    - Risk assessment and identification of all potential sources of infection;
    - Medical surveillance based on daily checks;

- - Medical removal policies for employees exhibiting symptoms;
  - Infection control and decontamination measures;
  - Training and education (managers, supervisors, and hourly employees);
  - Basic recordkeeping of the activities and results of the program;
  - Obtain the active participation of the workforce and their representatives, including, specifically, any labor unions present in the factory, in the development and implementation of the Infection Control Program;
  - Designate an Infection Control Officer for each facility;
  - Create an Infection Control Committee, depending on the size of the facility, large enough to effectively implement the Infection Control Program in each department or work area; and, in the case of large factories, with members assigned to carry out Infection Control measures as their primary work responsiblity;
  - Establish a proactive public information strategy to provide accurate information and counteract false or misleading information;
- Establish a policy of paid sick leave for ill individuals so that they stay away from work;
- Establish a paid leave program which prohibits discrimination or any punitive impact on employees on leave:
  - For employees with a positive test, exhibiting symptoms, or being ill;
  - For employees caring for ill family members;
  - For vulnerable employees, including those over 60, immune-compromised, and/or pregnant;
  - For employees who have been quarantined due to potential exposure to Covid-19 (e.g., via relatives or friends who are ill or presence in or travel to "viral hotspots");
- Recognize employees' right to express concerns about workplace safety, and their right to refuse unsafe work without dismissal or discrimination, and establish mechanisms for workers to express such concerns confidentially and/or anonymously if they so choose;
- Register the workplace with national and state government social security and health agencies implementing emergency financial and healthcare programs in response to the Covid-19 pandemic, including testing and treatment of the disease;
  - Enroll employees in such programs, so that employees on medical removal can receive necessary medical treatment and social support, and provide employees with documentation of their enrollment;
  - Establish the employer as the "stop-gap" payer of necessary medical testing and treatment in the event of delays in government programs;
- Cross train employees in anticipation of critical employees becoming ill;
- Develop a plan for an orderly shutdown of the facility if a spike in infection rates prohibits further operations to ensure:
  - A safe shutdown of production operations; and
  - Enrollment of all affected employees into state and national emergency health and social welfare programs.

Last updated April 15, 2020