



**Council of
Global Unions**
www.global-unions.org

Chair

*Stephen Cotton,
ITF*

Vice Chair

*Christy Hoffman,
UNI Global Union*

Secretary

*Sharan Burrow,
ITUC*

20 May 2020

Dr Tedros Adhanom Ghebreyesus
Director General
WHO
Geneva

Email: DGOOffice@who.int

RE: WHO GUIDE Considerations for public health and social measures in the workplace in the context of COVID-19

Dear Dr Tedros,

We are writing to you express our concerns regarding the WHO GUIDE “Considerations for public health and social measures in the workplace in the context of COVID-19” published on May 10th.

We in the Global Trade Union Federations/Council of Global Unions are deeply troubled to see that the WHO has produced guidelines on how the return to work should be managed, without consulting Trade Unions. It is our view that these guidelines undermine the International Labour Standards of the ILO, national public health policies and industry agreements designed to protect the rights and the health of workers and their communities.

We are alarmed to see that the recommendations advocate exposing workers to preventable health risks. We expect the WHO to give science-based information regarding the ongoing COVID-19 pandemic, and to give advice on steps to minimize the risk of transmission.

The approach of the Trade Union movement is that the Precautionary Principle should always be applied to any health risk. This is a novel, highly transmissible respiratory disease, the exact mode of transmission of which is not known. There is substantial evidence that, in common with influenza, SARS and MERS, it is a contact, droplet and airborne disease. Crucially, we believe that short-range aerosol transmission should be prevented as far as possible.

The WHO recommendation on physical distancing of ‘at least one metre’ is simply not sufficient, in our view. In many countries, national public policy and industry agreements insist on at least two metres physical distancing at all times. For all non-essential work activities where this cannot be achieved, those work activities should be suspended. The WHO is actively contradicting policies, guidelines and regulations developed by the social partners in response to the pandemic in a large number of countries, applying to all sectors of industry. In doing so, the WHO endangers workers’ health.

Such guidelines, unlike those of the WHO, take into account the rights of workers and their Trade Unions, and recognise their contribution to the prevention of the spread of the coronavirus.

The WHO guidelines omit any mention of the right of workers and their Trade Unions to be fully involved in risk assessments and prevention measures, as well as to refuse work that presents a serious and imminent risk to health. These rights are set out in ILO Convention 155 concerning Safety and Health at Work, and reiterated in sector specific Conventions for Safety and Health in Construction, Agriculture and Mining. These rights have been



transposed into many national laws and are included in public policy and industry agreements in response to the pandemic. These rights are enforced by public labour inspectorates as they inspect workplaces and respond to concerns raised by workers in the context of the pandemic. Similarly, the WHO makes no mention of protection from victimisation for raising safety concerns.

We regard the WHO advice to be inadequate in regard to: risk assessments and worker involvement in their preparation and approval prior to return to work; access to occupational health services; testing to identify pre-symptomatic/ asymptomatic workers; the employer's role in notification, reporting and recording of work-related cases of coronavirus related infections, and related mental health problems; the provision of PPE; and the identification and protection of vulnerable workers.

Prevention measures should include the right to remain off work if risk assessments indicate that work cannot be carried out safely, with physical distancing of at least 2 metres at all times or when individuals are identified as vulnerable or living with a vulnerable individual. Meticulous hygiene measures and rigorous administrative, training and work organisation measures will also be identified in risk assessments.

This WHO document was prepared without the involvement of Trade Unions, despite their important role in prevention of the spread of the coronavirus. It is stated that this document was developed in consultation with the LabAdmin/OSH Branch of the ILO. We find this surprising, given the absence of input from the constituents of the ILO and the evident lack of expertise regarding International Labour Standards and the principles and good practice in occupational safety and health management. The WHO should recognise that the Trade Unions and our on the ground Health and Safety representatives have unique expert knowledge critical in designing and implementing safe work practices.

Governments, employers and Trade Unions need reliable, science-based advice from the WHO. It is of crucial importance to avoid sending mixed messages that induce confusion, frustration, and failure to follow recommendations. The practical application of COVID-19 prevention measures in our workplaces and our communities depends upon it.

Yours sincerely,



Stephen Cotton
General Secretary, ITF
CGU Chair



Christy Hoffman
General Secretary, UNI Global Union
CGU Vice Chair



Sharan Burrow
General Secretary, ITUC
CGU Secretary



Sue Longley
General Secretary, IUF



Valter Sanches
General Secretary, IndustriALL



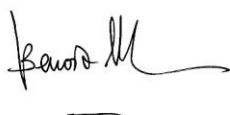
Ambet Yuson
General Secretary, BWI



Rosa Pavanelli
General Secretary, PSI



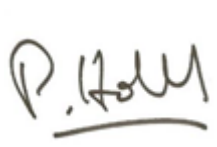
Anthony Bellanger
General Secretary, IFJ



Benoît Machuel
General Secretary, IAEA



David Edwards
General Secretary, EI



Pierre Habbard
General Secretary, TUAC