



HUMAN RIGHTS DUE DILIGENCE AND COVID-19: A RAPID SELF-ASSESSMENT FOR BUSINESS

2021 updated version



OVERVIEW OF THE RAPID SELF-ASSESSMENT

Introduction

The socio-economic shocks resulting from the global spread of COVID-19 come at a time of growing inequality, political instability, and ecological fragility. In this context, vulnerable and marginalized groups are hit particularly hard, with fewer resources to protect themselves from health risks, to access healthcare, or to pay for essential goods. Employers too, face significant pressures to protect their employees amid cancelled orders, a shortage of supplies, and the spread of infection.

Still, many businesses have risen to the challenge posed by COVID-19 by contributing medical supplies, implementing worker well-being initiatives, and offering support to impacted communities. These businesses deserve abundant praise, and indeed, this document is inspired in part by actual commitments and actions by businesses. However, leading firms also understand that they must go beyond contributions and address any negative impacts recent changes in their operations may be having on society and the environment. These companies understand that demonstrating respect for human rights, especially in the midst of harsh economic circumstances, is a strong reflection on their core values. They understand that preventing, mitigating and addressing adverse human rights impacts is key to maintaining trust—with clients, consumers, employees, shareholders, and communities—long after the crisis has passed.

Objective

The Human Rights Due Diligence and COVID-19: Rapid Self-Assessment for Business (C19 Rapid Self-Assessment), provides guidance to businesses who are seeking to manage the human rights impacts of their operations during the COVID-19 pandemic.

Highlighted Areas		
Occupational Health & Safety	Labour Rights	Environmental & Community Impacts
Safeguarding Privacy	Preventing Stigma & Discrimination	Corporate Policy & Management Considerations

This non-exhaustive list of recommended actions allows for rapid but continuous reflection on the human rights risks and impacts common to many industries. The list is an updated and extended version of the [C19 Rapid Self-Assessment published in April 2020](#) by UNDP, and it is informed by the relevant provisions of UN Human Rights Treaties, the ILO Fundamental Conventions, guidance from UNICEF and the UN Guiding Principles on Business and Human Rights (UNGPs). Admittedly, some of the actions may require a business to go beyond what is required by national law and reach for the highest level of due diligence.

Importantly, the C19 Rapid Self-Assessment should not be used as a comprehensive human rights due diligence tool as prescribed under the UN Guiding Principles on Business and Human Rights (UNGPs). While this assessment provides initial guidance, UNDP recommends that all companies consider immediate steps towards a fully-fledged human rights impact assessment, in response to COVID-19’s immediate and long-term effect on human rights in their operations and supply chains. Some of these actions may be more feasible for larger companies, however businesses of all size have a responsibility to respect human rights under the UNGPs. For companies without a human rights policy, this may also be an opportune time to explore the feasibility of a written, public commitment to prevent, mitigate and addressing adverse human rights impacts.

The C19 Rapid Self-Assessment is informed in part by UNDP’s global COVID-19 Integrated Response Offer. Through the ‘Prepare, Respond and Recover’ framework, UNDP is actively supporting the procurement and supply of essential health products, strengthening crisis management and response capacities, and addressing critical social and economic impacts around the world. The C19 Rapid Self-Assessment is offered by the Business and Human Rights in Asia (**B+HR Asia**) programme as a joint product of the *Enabling Sustainable Economic Growth through the Protect, Respect and Remedy Framework* project funded by the European Union and the *Promoting Responsible Business Practices through Regional Partnerships* project funded by the Government of Sweden.

COVID-19 RAPID SELF-ASSESSMENT

OCCUPATIONAL HEALTH & SAFETY

Actions	YES	NO	N/A
1. Address workplace risks and take appropriate occupational safety and health measures. ⁱ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Implement an effective emergency preparedness plan that incorporates COVID-19 response protocols. ⁱⁱ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Communicate information from trusted sources to your employees and their families/children (using posters, flyers, email, radio) about hygiene behaviors and physical distancing to prevent the spread of COVID-19, stigma prevention, disease symptoms and preparedness measures.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Ensure that access to health care and medical supplies including protective material such as facemasks are provided to all workers without any discrimination on the basis of sex, race, religion, language, nationality, disability, migrant status, sexual orientation, gender identity or membership in a social group facing marginalization/stigma. ⁱⁱⁱ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Regularly clean and disinfect <i>all</i> workplace environments and public spaces, bathrooms, dormitories, cafeterias to ensure health and safety of all workers and consumers. ^{iv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Promote workplace hygiene and ensure physical distancing in the workplace. ^v	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Provide women with proper safety equipment tailored to their needs (for example, protective gear in women’s sizes) and ensure access to hygiene products and gender-sensitive facilities. ^{vi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Prevent workers—particularly elderly workers, pregnant workers, or workers with pre-existing medical conditions—from exposure to unsafe or harmful working environments, including areas where risk is high for COVID-19 exposure. ^{vii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. Support pregnant women to take precautionary measures to protect themselves and to report possible symptoms to their healthcare provider. ^{viii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Take proactive measures to ensure that employees can contact family and friends in native towns/cities and that workers are not otherwise isolated from their support network. ^{ix}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Directly engage with workers and their representatives (e.g. trade unions), including virtually where necessary, about the immediate needs of workers and their families. ^x	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Have measures to in place that prevent young workers under age 18 and others limited in their ability to give informed consent from engaging hazardous work. ^{xi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Ensure that work premises and any employee housing facilities provided by the company allow for workers to practice social distancing, in accordance with WHO guidelines on social distancing. ^{xii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. Ensure that all reasonable steps taken to remove or reduce risks to employees are conducted in consultation with employees, including recommendations made by workers and/or health and safety committees (or representatives) during the COVID-19 crisis. If possible, consult with trade unions, CSOs and NHRIs. ^{xiii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Provide regular awareness raising and training on occupational health and safety policies and practices related to COVID-19 for all workers irrespective of their employment status or contract type. ^{xiv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LABOUR RIGHTS

Actions	YES	NO	N/A
16. Prepare a plan to ensure that workers are not dismissed. If workers must be dismissed, ensure that they are not dismissed without compensation and without procedural safeguards, particularly daily wage workers. ^{xv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Design a mitigation plan and evaluate whether workers that are laid off have access to social benefits.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. If employees do not have access to social benefits, mitigate impacts through compensation and also engage with government in order to address gaps in social protection and coverage.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Ensure that during and after the COVID-19 crisis period, workers are paid pursuant to the terms of their contract, and paid overtime as required, under terms consistent with local and international labour standards and when applicable in connection to government stimulus plans. ^{xvi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. When business operations scale up again, consider rehiring workers who were laid off during the crisis, or if hiring new workers, ensure that they are not discriminated against on the basis of sex, race, religion, language, nationality, disability, migrant status, sexual orientation, gender identity or membership in a social group facing marginalization/stigma. ^{xvii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Pay daily wage employees throughout the crisis, at reduced rates if necessary, proportionate and in accordance with national legislation and international standards. ^{xviii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Provide for special consideration for those providing care to family members. ^{xix}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Pay employees during periods while they are ill and unable to go to work, including during self-quarantine periods. ^{xx}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Provide health subsidies to affected employees and their families. ^{xxi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. Ensure that deductions from wages or salary for treatment of COVID-19 or related illness are not made without the employee's knowledge and consent to avoid conditions conducive to debt bondage. ^{xxii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

26. Prevent salary deductions for testing and treatment of COVID-19 or related illness without the employee's knowledge and consent. ^{xxiii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. Ensure equal pay for equal work irrespective of their sexual orientation, gender identity and expression and sex characteristic (SOGIESC) both during the COVID-19 crisis and in the post-crisis environment. ^{xxiv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. Recognize women as unpaid caregivers and accommodate their needs with flexible work or part-time work. ^{xxv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29. Provide flexible work arrangements that respond to the need of workers and their families. ^{xxvi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Take all measures necessary to prevent child labour from being used to fill gaps results. ^{xxvii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. Provide people with disabilities who have also suffered COVID-19 with special considerations to ensure their entry or re-entry into the workforce. ^{xxviii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. Ensure that employee identification, travel papers and/or other documents are never withheld or held only for legitimate purposes with employee consent, and in accordance with widely recognized labor rights standards. ^{xxix}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL & COMMUNITY IMPACTS

Actions	YES	NO	N/A
33. Take proactive steps to ensure the participation in Human Rights Due Diligence and Environmental Impact Assessment processes of (potentially) impacted individuals and communities that are unable to voice their concerns due to COVID-19 (e.g. due to restrictions of movement).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. Make socially beneficial communications to the public which avoid harmful stereotypes and seek to depict positive and progressive gender portrayals. ^{xxx}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

35. Take precautionary measures to ensure that the health of consumers or the general public is not further endangered by business operations.^{xxxvi}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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36. Ensure that relevant information on the risks of COVID-19, potentially arising from business operations, are shared with consumers and the general public, enabling them to take the necessary precautionary measures.^{xxxvii}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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37. Ensure all environmental protocols are followed in the discharge of toxic and hazardous materials, including facemasks, PPE, and gloves; communicate to workers that proper disposal remains a priority even in times of crisis.^{xxxviii}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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38. Conduct post-crisis assessment on how communities have been impacted by redundancies and take mitigating or remedial action as required.^{xxxix}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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39. Employ heightened levels of vigilance that property rights and property interest of communities are not violated during the COVID-19 crisis period.^{xxxv}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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40. Support the well-being of civil society actors, including human rights defenders, by voicing support for their work, reaching out where appropriate, and communicating with them on issues of mutual interest.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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41. For pharmaceutical or medical equipment companies, ensure that medicines and medical equipment remain publicly available and financially accessible to vulnerable groups.^{xxxvi}

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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42. If your business is an essential service (health, social work, water and sanitation, food and essential goods, energy, ICT, road repair, bank, payroll):

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- Start preparing for a Business Continuity Plan to ensure continuity of essential services for remote and impoverished populations;

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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- Support essential staff to identify daycare or, if necessary, setup a day-care system for children of essential staff.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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SAFEGUARDING PRIVACY

Actions	YES	NO	N/A
43. Disclose private information of consumers or the general public to governments only in accordance with data protection and right to privacy legislation that restrict disclosures of personal or other sensitive information. ^{xxxvii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
44. Develop and implement policies to ensure that names and contact information of workers found to have been infected by COVID-19 are not revealed to the workforce or the public at large, unless the worker consents. ^{xxxviii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
45. Train or provide refresher trainings of private security staff on respect for human rights in standard operating procedures, especially for those staff involved in COVID-19 screening procedures. ^{xxxix}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PREVENTING STIGMA & DISCRIMINATION

Actions	YES	NO	N/A
46. Ensure that when employees are permitted to return to the workplace, they are not subject to discriminatory treatment or otherwise stigmatized. ^{xi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
47. Establish procedures to counter the spread of false or misleading information so as to prevent fear and prejudice towards vulnerable groups in the workforce. ^{xii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
48. Ensure that employees are aware of responsible use of social media, to counter the spread of misinformation, fear, and prejudice in the workplace. ^{xiii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
49. Ensure minorities, migrants or other vulnerable groups are not negatively affiliated with COVID-19 in advertising, marketing campaigns or corporate communications, to prevent the promotion of stereotypes, misinformation or stigma against marginalized groups. ^{xiiii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
50. Educate the workforce on the risk of sexual harassment in all contexts including during virtual/work-from-home settings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CORPORATE POLICY & MANAGEMENT CONSIDERATIONS

Actions	YES	NO	N/A
51. Make timely payments and/or extend credit to small and medium-sized suppliers and retailers to ensure their viability through the COVID-19 crisis in line with applicable government stimulus policies. ^{xliv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
52. Retain contracts with suppliers, particularly small and medium-sized enterprises whenever possible. ^{xlv}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
53. Communicate regularly and promote transparency around corporate decisions and information related to COVID-19 to employees. ^{xlvi}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
54. Commit to a human rights policy that stipulates the enterprise's human rights expectations of personnel, business partners and other parties directly linked to its operations, products or services, in relation to COVID-19, and make it publicly available, for example, on the corporate website. ^{xlvii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
55. Communicate the company's human rights policy commitment to internal and external stakeholders. ^{xlviii}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56. Conduct human rights due diligence to identify, prevent, mitigate and account for adverse human rights impacts related to COVID-19. ^{xlix}	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
57. Where adverse human rights impacts related to COVID-19 are identified, provide for cooperate in their remediation, for example by providing for or facilitating immediate and adequate compensation. ⁱ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
58. To make it possible for grievances related to COVID-19 to be addressed early and remediated directly, establish or participate in effective (operational-level) grievance mechanisms. Examples include the establishment of a hotline or other mechanisms for reporting and resolving issues that arise out of COVID-19, and which are available to all employees, consumers or other affected people. ⁱⁱ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CONTACT

The C19 Rapid Self-Assessment is a living document as COVID-19 is an ongoing crisis and the nature and extent of risks are still to be identified fully. If you have feedback or contributions for future reiterations, please let us know.

The **B+HR Asia** Team is available for further guidance and tools. Please direct any question or request of further assistance to our team members below.

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- ⁱ Family-Friendly Policies and Other Good Workplace Practices in the Context of COVID-19: Key steps employers can take [hereinafter, Family-Friendly Policies], UNICEF, May 2020, accessed at: <https://www.unicef.org/media/66351/file/Family-friendly-policies-covid-19-guidance-2020.pdf>
- ⁱⁱ ILO Occupational Safety and Healthy Convention (No. 155), 1951; See also, Family-Friendly Policies UNICEF, May 2020.
- ⁱⁱⁱ International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111); ILO Occupational Safety and Healthy Convention (No. 155), 1951
- ^{iv} International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO Occupational Safety and Healthy Convention (No. 155), 1951
- ^v International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO Occupational Safety and Healthy Convention (No. 155), 1951
- ^{vi} International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO Occupational Safety and Healthy Convention (No. 155), 1951; See also, Coronavirus disease (COVID-19) advice for the public, accessed at: www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public
- ^{vii} International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO Occupational Safety and Healthy Convention (No. 155), 1951; Convention on the Elimination of Discrimination Against Women, 18 December 1979.
- ^{viii} International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; See also, WHO website resource, Q&A: Pregnancy, childbirth and COVID-19, accessed at: www.who.int/emergencies/diseases/novel-coronavirus-2019/question-and-answers-hub/q-a-detail/q-a-on-covid-19-pregnancy-and-childbirth
- ^{ix} ILO Convention on the Elimination of all Forms of Forced or Compulsory Labour (105), 1957
- ^x Family-Friendly Policies, UNICEF, May 2020, accessed at: www.unicef.org/media/66351/file/Family-friendly-policies-covid-19-guidance-2020.pdf
- ^{xi} ILO, Minimum Age Convention, 1973 (NO 138); ILO, Worst Forms of Child Labour Convention, 1951 (No. 100); ILO, Improving the Safety and Health of Young Workers, 28 April 2018, [available here](#)
- ^{xii} International Convention of the Protection of the Rights of All Migrant Workers and Members of Their Families, 19 December 1990; Coronavirus disease (COVID-19) advice for the public, World Health Organization, accessed at: www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public
- ^{xiii} ILO Occupational Safety and Healthy Convention (No. 155), 1951; see also, Family-Friendly Policies, UNICEF, May 2020, accessed at: www.unicef.org/media/66351/file/Family-friendly-policies-covid-19-guidance-2020.pdf
- ^{xiv} ILO Occupational Safety and Healthy Convention (No. 155), 1951
- ^{xv} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xvi} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xvii} ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- ^{xviii} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xix} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xx} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xxi} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xxii} ILO Convention on the Elimination of all Forms of Forced or Compulsory Labour (105), 1957
- ^{xxiii} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#).
- ^{xxiv} International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; ILO, Equal Remuneration Convention, 1951 (No. 100)
- ^{xxv} Convention on the Elimination of Discrimination Against Women, 18 December 1979.
- ^{xxvi} ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, 1998; ILO, Fundamental Conventions, 2003, [available here](#); International Covenant on Economic, Social, and Cultural Rights, 1976, Article 7; See also, UNICEF Family Friendly Policies, <https://www.unicef.org/media/66351/file/Family-friendly-policies-covid-19-guidance-2020.pdf>, page 4: "Provide flexible work arrangements that respond to the need of workers and their families. Arrangements can include, for

example, teleworking (see ILO guidance), flexi-time and reduced workload. Flexible work arrangements should be based on social dialogue and consultation with workers and their representatives.”

^{xxxvii} ILO, Minimum Age Convention, 1973 (NO 138); ILO, Worst Forms of Child Labour Convention, 1951 (No. 100)

^{xxxviii} Convention on the Rights of Persons with Disabilities, 2008; see also, How to do business with respect for children’s right to be free from child labour: ILO-IOE child labour guidance tool for business.

<https://www.ilo.org/ipec/Informationresources/WCMS_IPEC_PUB_27555/lang--en/index.htm>

^{xxxix} International Convention of the Protection of the Rights of All Migrant Workers and Members of Their Families, 19 December 1990; ILO Convention on the Elimination of all Forms of Forced or Compulsory Labour (105), 1957

^{xxx} See Family-Friendly Policies, UNICEF, May 2020, accessed at: <www.unicef.org/media/66351/file/Family-friendly-policies-covid-19-guidance-2020.pdf>

^{xxxvi} UN Guiding Principles on Business and Human Rights, 2011

^{xxxvii} UN Guiding Principles on Business and Human Rights, 2011

^{xxxviii} ILO Occupational Safety and Health Convention (No. 155), 1951; International Convention of the Protection of the Rights of All Migrant Workers and Members of Their Families, 19 December 1990

^{xxxix} UN Guiding Principles on Business and Human Rights, 2011

^{xl} Universal Declaration of Human Rights, Article 17; Protocol to the Convention for the Protection of Human Rights and Fundamental Freedoms, 1952, Article 1.

^{xli} International Covenant on Economic, Social, and Cultural Rights, 1976, Art. 12; OHCHR, Human Rights Guidelines for Pharmaceutical Companies in relation to Access to Medicines, 27 July 2015.

^{xlii} Companies may need to consider how to mitigate risks related to this type of disclosure, and consider whether information can be provided in an aggregate or de-identified form to avoid privacy law violations. Disclosed information should be limited in scope and time-bound in relation to COVID-19, see ILO, Protection of Workers’ personal data, An ILO Code of Practice, 1997, [available here](#); See also Industry Toolkit: Children’s Online Privacy and Freedom of Expression, UNICEF, May 2018, accessed at:

<[www.unicef.org/csr/files/UNICEF_Childrens_Online_Privacy_and_Freedom_of_Expression\(1\).pdf](http://www.unicef.org/csr/files/UNICEF_Childrens_Online_Privacy_and_Freedom_of_Expression(1).pdf)> (children’s personal data merit specific protection)

^{xliiii} ILO, Protection of Workers’ personal data, An ILO Code of Practice, 1997, [available here](#).

^{xliiiii} UN Guiding Principles on Business and Human Rights, 2011; ILO, Protection of Workers’ personal data, An ILO Code of Practice, 1997, [available here](#).

^{xlv} ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

^{xlvi} ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

^{xlvii} ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111);

^{xlviii} ILO, Discrimination (Employment and Occupation) Convention, 1958 (No. 111);

^{xlix} UN Guiding Principles on Business and Human Rights, 2011

^l UN Guiding Principles on Business and Human Rights, 2011

^{li} UN Guiding Principles on Business and Human Rights, 2011

^{lii} The policy commitment should also be approved at the most senior level of the business enterprise, while reflecting operational policies and procedures necessary to embed the policy throughout business operations. UN Guiding Principles on Business and Human Rights, 2011

^{liiii} UN Guiding Principles on Business and Human Rights, 2011

^{liv} UN Guiding Principles on Business and Human Rights, 2011

^{lv} UN Guiding Principles on Business and Human Rights, 2011

^{lvi} UN Guiding Principles on Business and Human Rights, 2011

^{lvii} UN Guiding Principles on Business and Human Rights, 2011