



► Ten lessons from enterprises operating under the “3 on-site” scheme during Viet Nam’s 4th COVID-19 outbreak

In mid-July 2021, during the 4th COVID-19 outbreak in Viet Nam, the local authorities of Ho Chi Minh City and neighbouring provinces issued regulations requiring enterprises to implement a model called “3 on-site” (3OS) to continue their production during lockdowns or else stop operations. 3OS requires a limited workforce to work, sleep and eat on “sealed-off” factory premises to reduce the risk of infections through community transmission while maintaining operations.

By 20th of July, in Binh Duong province alone, more than 3,700 enterprises with about 390,000 workers registered for 3OS with local authorities. A week later, some enterprises discovered COVID-19 cases among the on-site workforce, despite all precautions. On 28th July, the Binh Duong Furniture Association (BIFA) organized a webinar for members to assess the situation and share the experiences with the 3OS scheme.

- **Disclaimer:** This is an ILO rapid response note capturing practices shared by enterprises participating in the BIFA webinar which does not imply ILO endorsement of such practices. Due to the rapidly changing COVID-19 situation, readers should consult with national and local Governments for updates of the situation and changes in regulations.

Lessons shared by Vietnamese enterprises

1. Carefully consider the benefits vs. costs of 3OS

3OS allows enterprises to maintain production to fulfil orders and ensure supply of goods and services. However, 3OS requires significant resources and logistical capacity to build and operate on-site dormitories, hygiene and canteen facilities and to maintain the in- and out-flow of goods, while keeping the factory sealed-off. Despite investments and precautions, risks remain that the enterprise will have to stop production if COVID-19 cases are found in the workforce. Enterprises should consider all of these factors before deciding to implement 3OS.

2. Consult local authorities regarding COVID-19 restrictions

Authorities of different provinces and districts follow different strategies, regulations and interpretations of how certain provisions ought to be implemented. For example, some districts restrict movement of supplies and finished goods. Regulations may also change with little upfront notice due to the volatile COVID-19 situation. Consulting the local authorities is essential before and during 3OS implementation to ensure enterprises operate in line with legal requirements.

3. Consult with workers and obtain consent

Workers need to freely and voluntarily consent to the conditions of working, sleeping and eating on-site. According to International Labour Standards, restriction of freedom of movement of workers can only be justified to face exceptional circumstance in the event of an acute crisis and must be limited in time, strictly adapted and proportionate to the objective constraints they address.

On-going dialogue and consultations between management and workers and trade union representatives is essential in this situation. Topics of discussion may include the business situation,

working conditions, health risks, wages and bonuses, on-site conditions and medical support, meal-plans and difficulties that may arise during 3OS. Workers should be briefed on a daily basis on the evolving situation and be able to voice their concerns at any time.

Some workers might need to leave the factory despite previous consent. Enterprises should prepare for such cases and support workers, for example with travel arrangements. Enterprises can refuse workers without sufficient COVID-19 testing to re-enter the workshop but must allow any employee to leave the premise if they wish to do so.

4. Assess non-COVID-19 related occupational safety and health (OSH) risks

Many factory premises following 3OS were not designed to host workers permanently. Employers have an obligation to ensure that accommodations in this case are safe and without health risks. The presence of workers at all times may aggravate exposure to occupational risks and require adjustments. Workplace should revise their risk assessments with involvement of workers representatives or OSH committees to implement preventive and control measures as required.

Enterprises should particularly pay attention to the mental health of workers. Workplace confinement can lead to psychosocial distress causing workers to pay less attention to safety. Extra attention should also be paid to ensure work organisation is in line with hours of work and rest breaks as stipulated in the labour code. 3OS can be particularly hard for workers with family responsibilities and support should be provided to ensure workers can regularly communicate with their families and that their families are supported in absence of the family member. Other good practices to support employees during 3OS include providing good food and provide entertainment.

5. Ensure sufficient support and service from local healthcare providers

3OS arrangement requires intensive support from healthcare providers in testing, quarantine arrangement, transport and treatment for infected patients. The readiness and capacity of local healthcare services is essential for enterprises implementing 3OS.

6. COVID-19 test arrangements

Anybody staying on-site must be tested before entering. Enterprises should check reliability of quick tests vs. PCR tests and consult medical experts and local authorities to determine reliable testing procedures. Testing should also be considered for workers who do not stay on-site to detect possible infection points.

Risk stages: Some enterprises use colour coding to classify the infection risks:

- ▶ Red zone: Even with all workers testing negative upon entrance, the COVID-19 risk is still high within the first week of 3OS due to the incubation period of the virus.
- ▶ Green zone: If no positive cases are found after re-testing after two weeks, the risk of COVID-19 is low though the risk of contamination from the outside needs to be monitored closely.
- ▶ Yellow zone: If no positive cases are found after re-testing everybody after 1 week and the premises are properly sealed-off, the likelihood that infected workers have entered the premises lowers.
- ▶ Random tests or sample test of different parts of the workforce can be used to further manage the risk of undetected COVID-19 cases.

7. Maintain a security perimeter between inside and outside

Workplaces following 3OS must ensure no physical contact between employees inside the sealed-off area and anyone outside. Enterprises might need to review security arrangements and fencing to ensure

the premises are sealed-off. However, in case of an emergency like a fire, it should be possible for the entire workforce to safely evacuate from buildings and premises if necessary.

8. On-site social distancing

Inside the sealed-off premises, enterprises should maintain social distancing between production lines, units, workshops, to minimize the risk of infection spreading should there be a positive case on-site. In consultations with workers, enterprises can set up teams that work, sleep and eat in designated parts of the premises

Factory entrance areas should be completely separated from the main production areas to minimize the infection risk through contacts with suppliers and delivery.

9. Duration of the 3OS arrangement

Some enterprises into the 4th week of 3OS report that it is increasingly difficult over time to maintain the arrangements. Enterprises should regularly re-assess their capacity and resources to maintain 3OS and also consider motivation and physical and mental health of workers and managers when deciding on 3OS extensions. Once the lockdown is lifted, restricting workers’ movements is no longer admissible and 3OS arrangements should end.

10. Preparations for possible infected cases

Enterprise should prepare for a scenario in which a positive case is detected in the isolated workforce and develop an “F0 response plan”, in line with [Ministry of Health decision 2787 from 5th June 2021](#).

- ▶ F0 preparedness should include the dedicating a separate F0 quarantine facility for male and female workers with toilets and outdoor areas.
- ▶ Local authorities need to be informed immediately as soon as an infected case is found to avoid legal liability issues for enterprises.
- ▶ Enterprises can run "F0 response drills" to ensure the workforce knows which procedures to follow. Such a drill can help employees to stay calm and act in line with procedures (panic outbreaks have been reported in enterprises on such occasions).
- ▶ Support for infected employees: Necessity packages including general medicines, a light jacket, personal amenities, instant noodles or similar food etc. should be prepared for infected employees in case they are required by local authorities to move to a dedicated quarantine facility or hospital.
- ▶ Delegation of authority: Managers should ensure business continuity in case they themselves are infected and need to stay in quarantine.

More information:

- [Reference documents from Ministry of Health and National Steering Committee for COVID-19 Prevention and Control](#)
- [Key provisions of ILO labour standards relevant to the COVID-19](#)

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