



VAN BAEL & BELLIS

Update on Belgian employment law

How to ensure compliance with applicable
legislation in a mostly virtual working
environment

Webinar – 3 March 2021

A practical webinar for employers wishing to stay up to date
with the latest developments in Belgian employment law



Remote working: Dos and Don'ts



Applicable furlough regimes



Key points to note in relation to dismissals



Virtual recruitment of employees and legal requirements involved



Updates regarding health and safety at the workplace

REMOTE WORKING : Dos and Don'ts

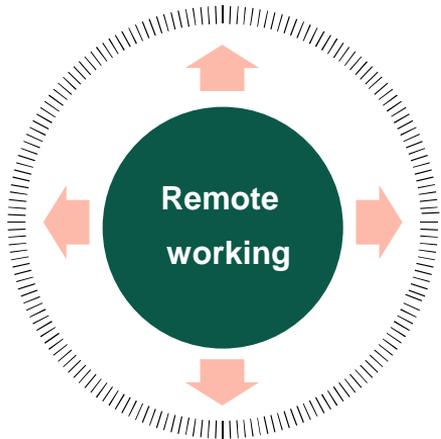
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Structural teleworking
(CLA No. 85)



Occasional teleworking
Law of 5 March 2017 on
feasible and manageable
work (*LFM*)



Teleworking to cope
with Covid-19
(CLA No. 149)



Homework (LEC)



Remote working : what & when ?

Homework

Legal basis? Articles 119.1 – 119.12 of LEC



Sanctions: 10 % of the salary as allowance & possible unilateral termination with immediate effect by the employee

When? When the work, although it could be carried out at the premises of the employer, is carried out, on a structural basis, outside these premises without being subject to the direct control of the employer. It **does not require the use of information technology**. Mainly applies to **mobile workers**.

Occasional teleworking

Legal basis? Article 22 – 28 of LFM

When? In case of **force majeure** (e.g., strike) or personal reasons (e.g., sick child) in accordance with the procedure defined at company level.

Structural teleworking

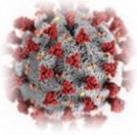
Legal basis? CLA No. 85

When? When the work requires **the use of information technology** and, although it could be carried out at the premises of the employer, it is carried out, on a structural basis, outside these premises, either at the employee's home or at another location chosen by him. **Does not apply to mobile workers**.

Mandatory teleworking (Covid-19)

Legal basis? CLA No. 149

When? **If no written framework has been implemented** regarding telework (structural or occasional telework) in a CLA, individual agreements or a policy which has been adopted whilst complying with the rules on social consultation on 1 January 2021



Mandatory teleworking to cope with Covid-19

Remote working

Position of the Belgian authorities : the implementation of **teleworking is currently mandatory for all businesses** regardless of their nature (public or private) and whether or not the business is considered to be essential

Two exceptions:



- 1 If teleworking cannot be applied due to the **nature of the function performed** (e.g., blue-collar employees)
- 2 In order to guarantee the **continuity of the business** (e.g., the IT department of an organisation)

If teleworking cannot be applied, the employer must:



- 1 Provide those employees who cannot perform telework with a **certificate** proving that their presence on the factory floor / in the workplace is required
- 2 Take sufficient measures to ensure **maximum compliance with the rules on social distancing** and the prevention of Covid-19 contaminations



The SIRS/SIOD (*Service d'information et de recherche sociale / Sociale Inlichtingen- en Opsporingsdienst*) carries out audits frequently

Principles (1/3) ?



- **Suppletive** nature : does not apply to organisations which implemented a written regime of teleworking in a CLA, individual agreements or a policy which has been adopted whilst complying with the rules on social consultation on 1 January 2021



- **No discrimination** of teleworkers, *i.e.*, same rights and duties as other employees



- Employer's right to monitor the results and/or the performance of teleworking, in an **appropriate and proportionate manner**



- Measures to maintain the psychological and social connection between teleworkers and their colleagues as well as the company, in order to prevent any isolation, with particular attention to **"vulnerable" employees**

Principles (2/3) ?



- **Agreement** with each teleworker
- **How?** Collective agreements, work rules or individual agreements or policies adopted whilst complying with the rules on social consultation
- **Content?**
 - The provision by the employer of the **equipment and technical support** necessary for teleworking
 - **If** the teleworker uses his **own equipment**, the reimbursement or payment by the employer of the **installation costs** of the relevant IT programs and the **additional costs of their use, operation, maintenance and depreciation**
 - **In any case**, the coverage of **additional connection** costs for the employee
 - Lump sum allowance, costs paid on evidence of individual expenditure, etc. → **lump sum allowance increased** to EUR 144.31 as from 1 April 2021
 - The **(minimum) working time** arrangements which apply (and the periods of availability of the employee)

Principles (3/3)?



- Nothing provided in the written agreement regarding the (minimum) **working time** arrangements which apply? The working schedules as mentioned in the work rules apply to the teleworker



- Information of the employee about the company's policy on **well-being at work**, specifically related to teleworking

Example: information and guidelines on preventive measures, in particular on adapting the workstation, the proper use of screens and the available technical and IT support

Dos

Make sure that a written teleworking regime is in place → If not, implement compliant regime *asap*

Check that the requirements of CLA No. 149 are covered

Put relevant equipment at the teleworkers' disposal and/or agree on the coverage of costs

Take appropriate measures in relation to the employees' health & safety

Consult with the (internal and/or external) service for prevention and protection at work and the Committee for Prevention and Protection at Work

Do not discriminate against teleworkers

No adoption of written teleworking framework or any framework that does not comply with CLA No. 149

Do not reimburse for a second time the same costs connected to teleworking
Risk: qualification as remuneration

Do not impose teleworking outside of Covid-19

Don'ts

Poll questions: please answer

Has your organisation implemented a written framework regarding teleworking already?

Yes

No

Yes but it should be updated

Is it possible to provide that the employees' monthly salary covers the costs in relation to teleworking within the framework of CLA No. 149?

Yes

No

May the authorities levy fines in the absence of a written framework regarding teleworking?

Yes

No

Poll questions: answers

Has your organisation implemented a written framework regarding teleworking already?

Yes

No

Yes but it should be updated

Yes – No
Yes but should be updated

Is it possible to provide that the employees' monthly salary covers the costs in relation to teleworking within the framework of CLA No. 149?

Yes

No

Yes - but subject to interpretation

May the authorities levy fines in the absence of a written framework regarding telework?

Yes

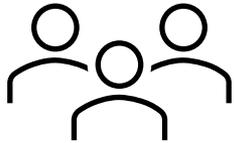
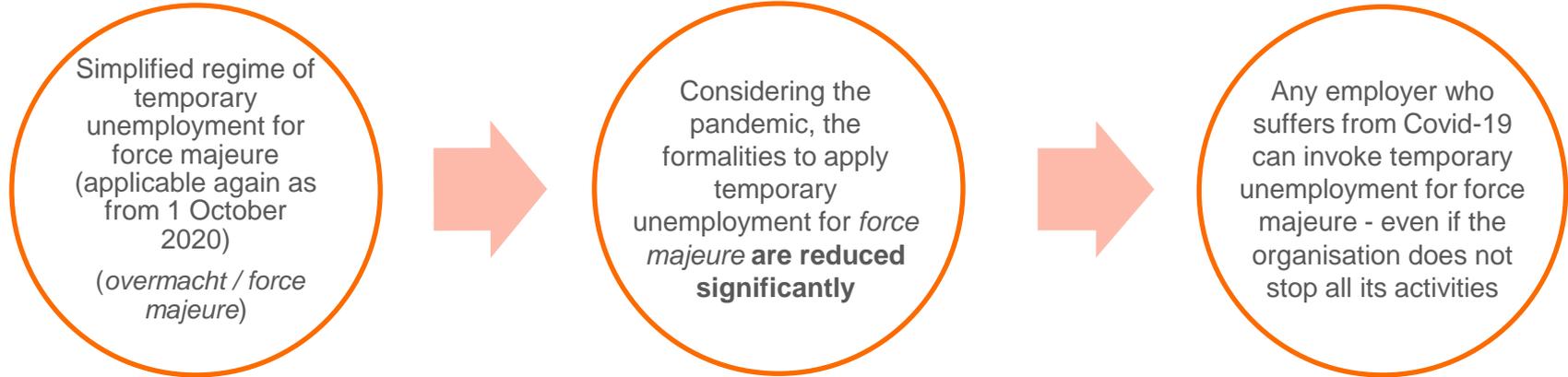
No

Yes, administrative fines may be imposed of up to EUR 800 per employee concerned (with a maximum of 100 employees)

Applicable furlough regimes



The regime of temporary unemployment for force majeure due to Covid-19 Current regime



The regime applies as well for :

- employees who are not sick but who should stay at home due to quarantine
- employees who: (i) are absent from work to take care of a child as a result of the closure of a day-care centre, school or care centre for disabled children; and (ii) who submit a certificate demonstrating the closure of the institution concerned due to Covid-19

The regime of temporary unemployment for force majeure due to Covid-19



- Initially until 31 March 2021 but **prolonged until 30 June 2021**

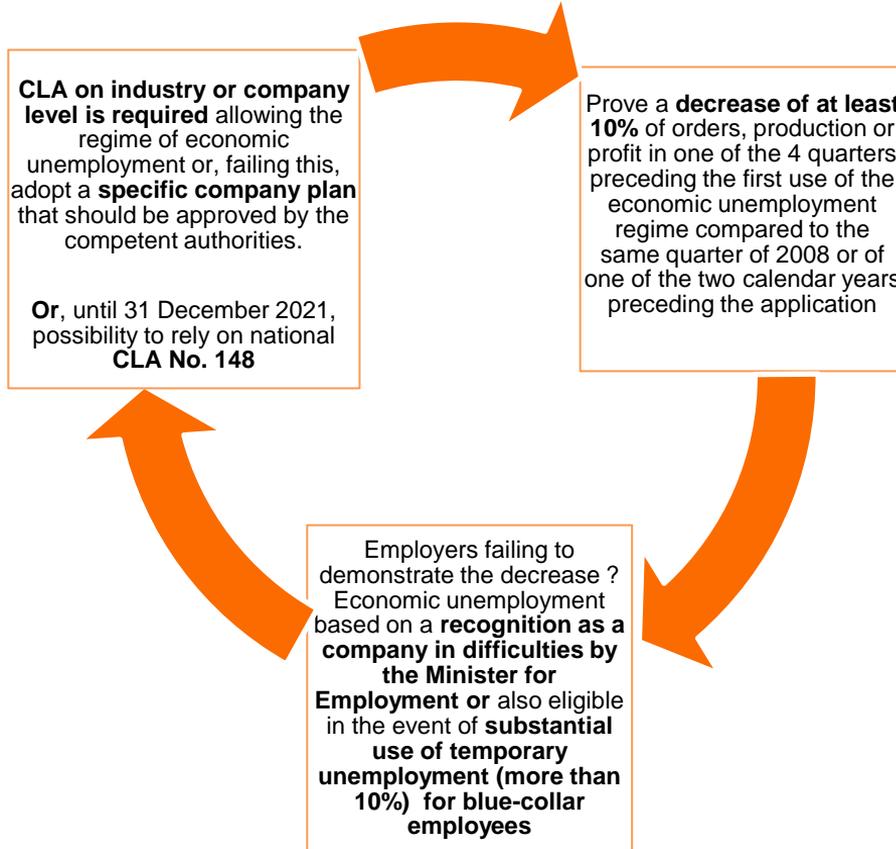


- **Unemployment allowances** of 70% of the employees' normal gross salary (capped at EUR 2,754.76 gross)
- **Reduced** rate of 15% **withholding taxes**
- Additional EUR 5.63 net per day paid by the NEO
- Industry supplements may apply
- Employer can also provide for **supplements** - not subject to social security contributions provided the **overall net salary** of the employee does **not exceed the normal net salary**



- The suspension of the employment contract can be **part-time or full-time**
- Days of unemployment to be taken per full day → more flexibility in the future?

The regime of temporary unemployment for economic reasons Outside Covid-19



The regime of temporary unemployment for economic reasons Outside Covid-19



- **Mandatory information** to be included in the CLA or company plan which adopts the furlough regime
- **Notification** to NEO and works council / trade union delegation

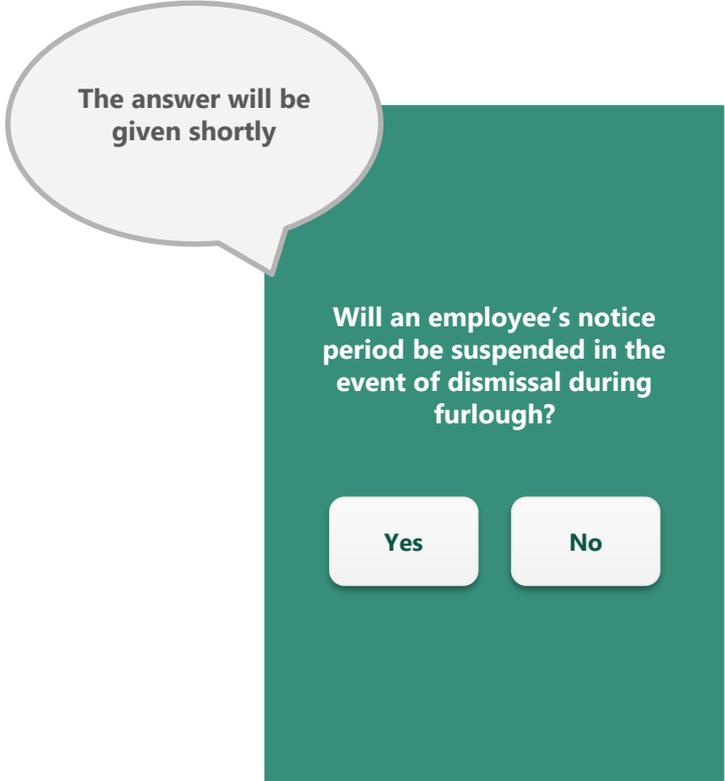


- **Unemployment allowances** of 65% of the employees' normal gross salary (capped at EUR 2,754.76 gross) provided the employee meets the conditions to be eligible for unemployment
- 26,75 % withholding taxes
- **Supplements to be paid by the employer** (not subject to social security contributions) at least equal to the supplement provided for blue-collar employees (at industry level). A minimum of EUR 5 per day (where company plan in place) or EUR 2 per day (otherwise)



- The suspension of the employment contract can be **full-time** or **part-time**. In the event of part-time: a minimum of two days of work per week
- Full-time: maximum of 16 weeks
- Part-time: maximum of 26 weeks

Poll question: please answer via the click button



The answer will be given shortly

Will an employee's notice period be suspended in the event of dismissal during furlough?

Yes No

The image shows a dark green rectangular area containing a poll question. Above the question is a light grey speech bubble with a tail pointing to the top-left corner of the green area. Below the question are two white buttons with rounded corners, one labeled 'Yes' and one labeled 'No'.

**Key points to note
in relation
to dismissals**





Furlough and dismissal with a notice period to be performed



Bonus plans without specific targets to be met by the employees

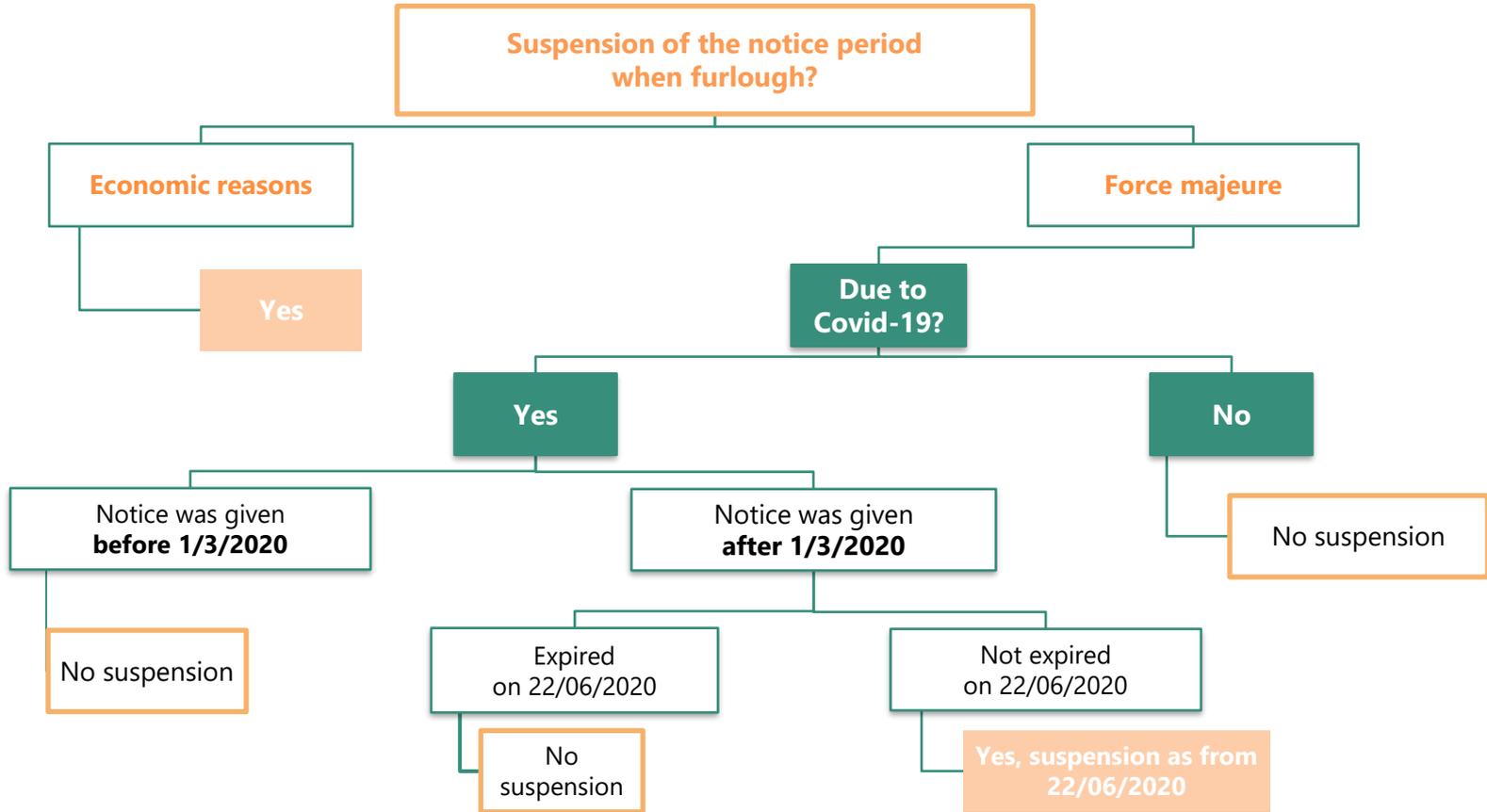


Refusal to wear a mask: serious cause?



Time credit to take care of a child and calculation of severance pay

Furlough and dismissal with a notice period to be performed



Refusal to wear a mask despite the obligation in place

Sufficient to be considered
as serious cause,
i.e., immediate and
definitive breach of trust ?

**Accepted by the Labour
Court (div. Hasselt)**

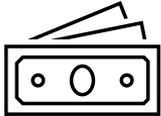
Judgement of 8 July 2020



Specific circumstances ?

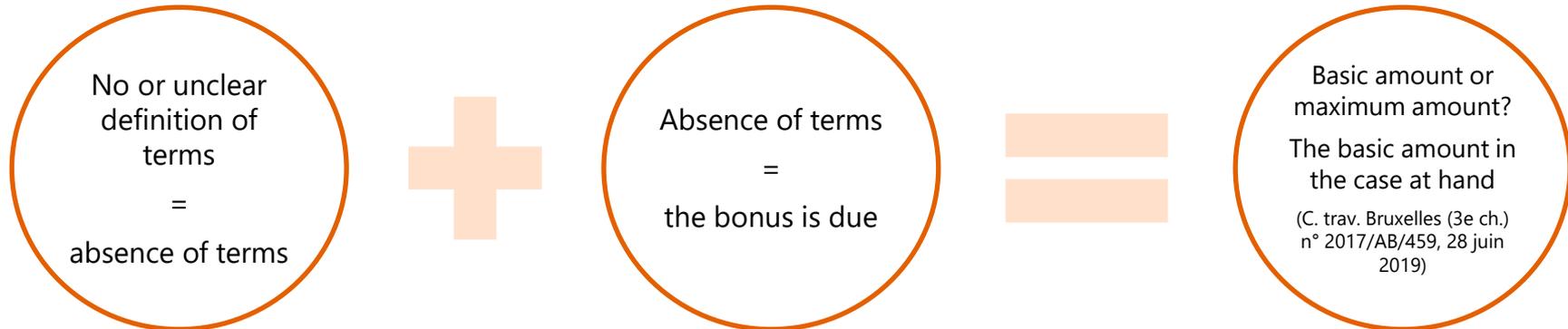
- The employee's position
- The safety requirements given the pandemic
- The nature of the company's activity (food industry)

Bonus plans without specific targets to be met by the employees



Very often an employment contract stipulates that an employee is entitled to a bonus subject to the achievement of targets which will be set on an annual basis

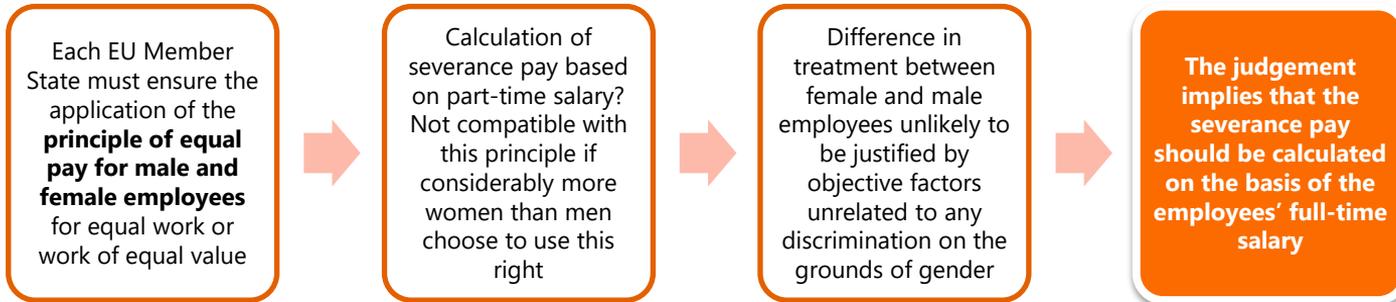
Quid if the targets have never been set and/or communicated by the employer to the employee?
According to the Labour Court of Brussels, the employee is entitled to a bonus provided:



Time credit to take care of a child and calculation of severance pay



Supreme Court judgement of 22 June 2020
(> < contradictory judgement from the Constitutional Court of 7 November 2019)



Bear in mind

- There is a risk that the lower Labour Courts (of Appeals) will follow the most recent judgement from the Supreme Court, which implies that the severance entitlements of those employees benefiting from time credit in order to take care of a child should be calculated on the basis of the employees' full-time salary in place prior to the time credit
- An employee who benefits from time credit is protected against dismissal and can be dismissed only for reasons unrelated to the time credit

**Virtual recruitment
&
Legal requirements involved**



Interview

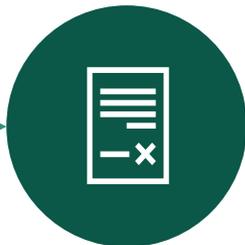
Possibility to recruit remotely via Skype, Teams, Webex, etc.

Legal requirements? CLA No. 38 and data protection regulations



Offer of employment

If the offer provides sufficient details regarding the working conditions, it can be considered as an employment contract upon acceptance of the employee



E-signature ?

Yes, but only via the application eID or via a so-called "qualified signature"



Start of the employment

Reminder: some contracts must be signed at the latest on the start of the employment

(Virtual) interviews and legal requirements

Employment legal requirements (CLA No. 38)

- Equal treatment of the candidates
- Requirement to provide the candidate with a proof of the interview upon request
- Free of charge for the candidate
- (Detailed) information should be provided regarding the position concerned
- Questions regarding the candidate's privacy may be asked only if this is required to determine whether the candidate suits the position

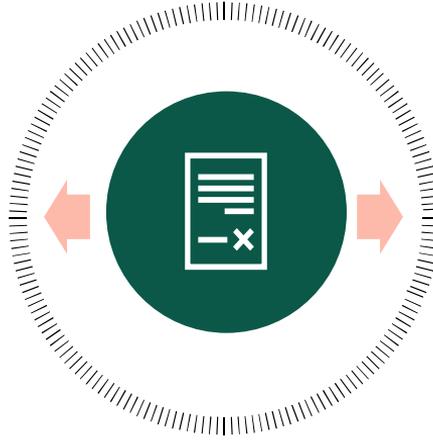


Data protection requirements

- Compliance with GDPR and Belgian legislation regarding the processing of the candidates' personal data

Offer of employment

If the offer of employment provides for the **essential working conditions** the mere acceptance by the candidate may trigger the conclusion of an employment contract



None of the following constitutes an offer of employment: mere interviews, preliminary discussions or proposals which are not intended to constitute an employment contract, but which are intended only to facilitate, prepare the conclusion of, or examine the possibility of an employment contract (**Supreme Court (1 February 1982)**)

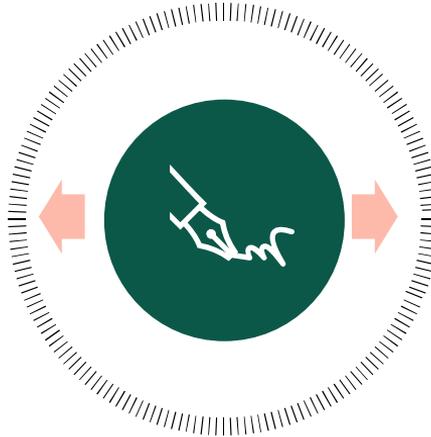


Pay attention to **the wording** of the offer that you send to the candidate

Is it possible to sign an employment contract electronically?

E-signature? Yes, if certain conditions are met:

- The employee **cannot be forced** to sign electronically
- The employment contract may be signed only via the **Belgian application eID** (using the employee's identity card) or a website/application which guarantees a so-called **"qualified"** signature



What if the employment contract is signed via another electronic application (e.g., DocuSign)?

- Employment contract signed via non-qualified forms of electronic signatures cannot be considered as "non-existing"
- Their evidential value however can be challenged

Service providers for so-called “qualified” e-signature

Trusted List Belgium

Trusted service providers

Currently active trust service providers

Belgian Mobile ID SA/NV QVal for QESig QVal for QESeal

Connect Solutions QeRDS

GlobalSign NV/SA QCert for ESig QCert for ESeal QWAC QTimestamp

Portima s.c.r.l. c.v.b.a. QCert for ESig

Society for Worldwide Interbank Financial Telecommunication SCRL
QCert for ESeal

Zetes S.A./N.V. QCert for ESig QTimestamp

Certipost n.v./s.a. QCert for ESig

DigiCert Europe Belgium B.V. QCert for ESig QCert for ESeal

Kingdom of Belgium - Federal Government QCert for ESig

SA UNIFIEDPOST QeRDS

Universign QCert for ESig QCert for ESeal



E-signature – is the qualified signature required for all employment documents?

Qualified electronic signature (and/or handwritten signature)	Simple electronic signature is sufficient (e.g., DocuSign)
<ul style="list-style-type: none">▪ Fixed-term employment contract▪ Part-time employment contract▪ Full-time employment contract*▪ Non-compete clause▪ Letter of termination with notice to be performed▪ Justification letter termination for serious cause	<ul style="list-style-type: none">▪ Letter of termination with immediate effect▪ First letter termination for serious cause▪ Settlement agreement▪ Holiday request▪ Acknowledgement of receipt of company policy or work rules▪ Evaluation forms

*In theory, one could consider concluding this contract by ordinary electronic signature as the law does not explicitly provide that a full-time employment contract must be concluded in writing. However, the Federal Public Service of Employment recommends the use of a qualified signature in this case as well.

Will the electronic sending of payroll documents become the rule?



According to the LEC, the employees and the employer may mutually agree to send and archive certain payroll documents electronically

However, providing such documents in hard copy remains the rule

CHAMBRE DES REPRÉSENTANTS
DE BELGIQUE

SESSION EXTRAORDINAIRE 2019

13 septembre 2019

PROPOSITION DE LOI

modifiant la loi du 3 juillet 1978
relative aux contrats de travail
et la loi du 3 juin 2007 portant
des dispositions diverses relatives au travail
en ce qui concerne la numérisation
des documents sociaux

(déposée par M. Björn Anseeuw et consorts)

BELGISCHE KAMER VAN
VOLKSVERTEGENWOORDIGERS

BUITENGEWONE ZITTING 2019

13 september 2019

WETSVOORSTEL

tot wijziging van de wet van 3 juli 1978
betreffende de arbeidsovereenkomsten
en de wet van 3 juni 2007 houdende
diverse arbeidsbepalingen inzake
digitalisering van arbeidsrechtelijke
documenten

(ingediend door de heer Björn Anseeuw c.s.)

The Chamber wishes to reverse this situation Proposed Law of 13 September 2019

- Providing the documents concerned electronically would become the rule, unless the employee expressly states that he does not wish to receive certain documents electronically
- The employee could change this decision on an annual basis
- Proposal supported by the Belgian National Labour Council (opinion No. 2.178 of **29/09/2020**) - with some remarks (*a.o.*, the absence of qualified and ISO-certified electronic archiving service provider in accordance with the Code of Economic Law)

HEALTH & SAFETY AT WORK - UPDATES





Guide générique :

Liste de contrôle Covid-19

IDENTIFICATION de l'entreprise contrôlée : N° BCE ou n° UE

Remise copie Liste de contrôle COVID-19 Oui Non

Volet OBLIGATOIRE

- Les Comités pour la Prévention et la Protection au Travail compétents n'ont pas été impliqués et n'ont pas remis d'avis sur l'analyse des risques COVID-19 et les mesures.
 - Service interne/externe
 - Coordinateur sécurité
- La consultation relative à l'analyse des risques COVID-19 et les mesures à prendre n'a pas eu lieu.

- Hygiène des mains**
- Les installations sanitaires ne sont pas équipées d'eau, de savon et de serviettes en papier ou d'un distributeur avec du papier ou avec textile continu.
 - Des essuies en tissu ou des sèche-mains électriques sont utilisés.
 - Lorsque le lavage des mains n'est pas possible, aucun gel hydroalcoolique n'est prévu.

- Distanciation sociale : garder une distance de 1,5 m dans et autour du bâtiment**
- La distance entre les postes de travail sans cloison est inférieure à 1,5 mètre
 - Pas de distanciation sociale dans les toilettes (p.ex. : nombre limité, appareils condamnés, ...).
 - Aucune mesure de distanciation sociale n'a été prise pour les sièges ou les salles de réunion (par exemple : nombre de sièges limité, places condamnées, affiches, ...).
 - Aucune mesure de distanciation sociale n'a été prise dans les vestiaires (par exemple : des vestiaires supplémentaires prévus, places condamnées, affiches, ...).
 - Il n'y a pas d'itinéraires marqués avec des marquages, des rubans, des cloisons, des affiches, ...
 - Aux entrées et sorties ou aux passages étroits, il n'y a pas de circulation prioritaire ou à sens unique.
 - L'utilisation des ascenseurs n'est pas limitée.

- Hygiène générale**
- Les surfaces courantes souvent touchées telles que les poignées, les distributeurs automatiques et les appareils ne sont pas nettoyées.
 - Il n'y a pas ou peu d'équipements de protection collectifs tels que des cloisons, des rubans et des marquages. Les personnes présentes sont donc dépendantes d'équipements de protection individuels tels qu'un masque buccal.

- Ventilation**
- La ventilation naturelle ou mécanique des locaux de l'entreprise est insuffisante.
 - Des ventilateurs individuels sont utilisés.

- *Les tiers* : les travailleurs intérimaires et les personnes externes telles que les fournisseurs, les clients et les entrepreneurs**
- Les tiers sont insuffisamment informés des mesures COVID-19 prises dans l'entreprise.
 - Les propres travailleurs ne sont pas suffisamment informés sur les relations avec les tiers.
 - Les mesures prises pour les propres travailleurs sont moins bien appliquées pour les tiers.

- Mesures secteur horeca et les autres établissements de restauration et débits de boissons**
- Le café/restaurant est ouvert aux clients visiteurs (pas seulement aux pick-up).
 - Le restaurant/friterie/snack bar/... propose des repas/des boissons à emporter après 22 heures.
 - Le bar/restaurant de l'hôtel est ouvert
 - Les mesures pour les cuisines de collectivité pour les communautés résidentielles, scolaires, de vie et de travail ne sont pas respectées (p.ex. max. 4 pers. à table, places assises uniquement, personnel portant masque buccal, ...).

Mesures de fermeture obligatoire

- Le salon de coiffure/barbier, salon de manucure, salon de massage, institut de beauté, pédicure non médicale, salon de tatouage et de piercing est ouvert et emploie toujours du personnel.

Télétravail à domicile

- L'obligation de télétravail n'est pas respectée pour tous les postes qui se prêtent à cette fin et qui ne sont pas nécessaires à la continuité des opérations, des activités ou des services de l'entreprise.
- L'obligation de généraliser le télétravail pour toutes les fonctions qui s'y prêtent et qui ne sont pas nécessaires à la continuité de la prestation de services n'a pas été mise en œuvre et prise dans le respect des règles de concertation sociale applicables (comité, délégation syndicale) ou, à défaut, en concertation avec les travailleurs eux-mêmes et en consultation avec les services compétents en matière de prévention et de protection au travail.
- L'employeur ne délivre pas d'attestations pour les travailleurs qui ne sont pas (en permanence) en mesure de télétravailler, confirmant la nécessité de leur présence sur le lieu de travail.

Commentaires possibles à propos des cases cochées :

.....

Obligations supplémentaires dans les secteurs de la construction, du nettoyage, de l'agriculture, de l'horticulture et de la viande

- Le registre obligatoire n'est pas tenu conformément aux dispositions.
- Le registre obligatoire n'a pas été mis à ma disposition.
- Une PLF complétée n'a pas été présentée pour chaque salarié ou indépendant.

Ce contrôle :

- Donne lieu à un délai pour se mettre en règle
- Donne lieu à un avertissement
- Donne lieu à la rédaction d'un Pro Justitia
- Donne lieu à une communication/info à un ou plusieurs services compétents
- Reste sans suite (situation conforme)

Date et heure du contrôle

Nom, service & signature de l'inspecteur social

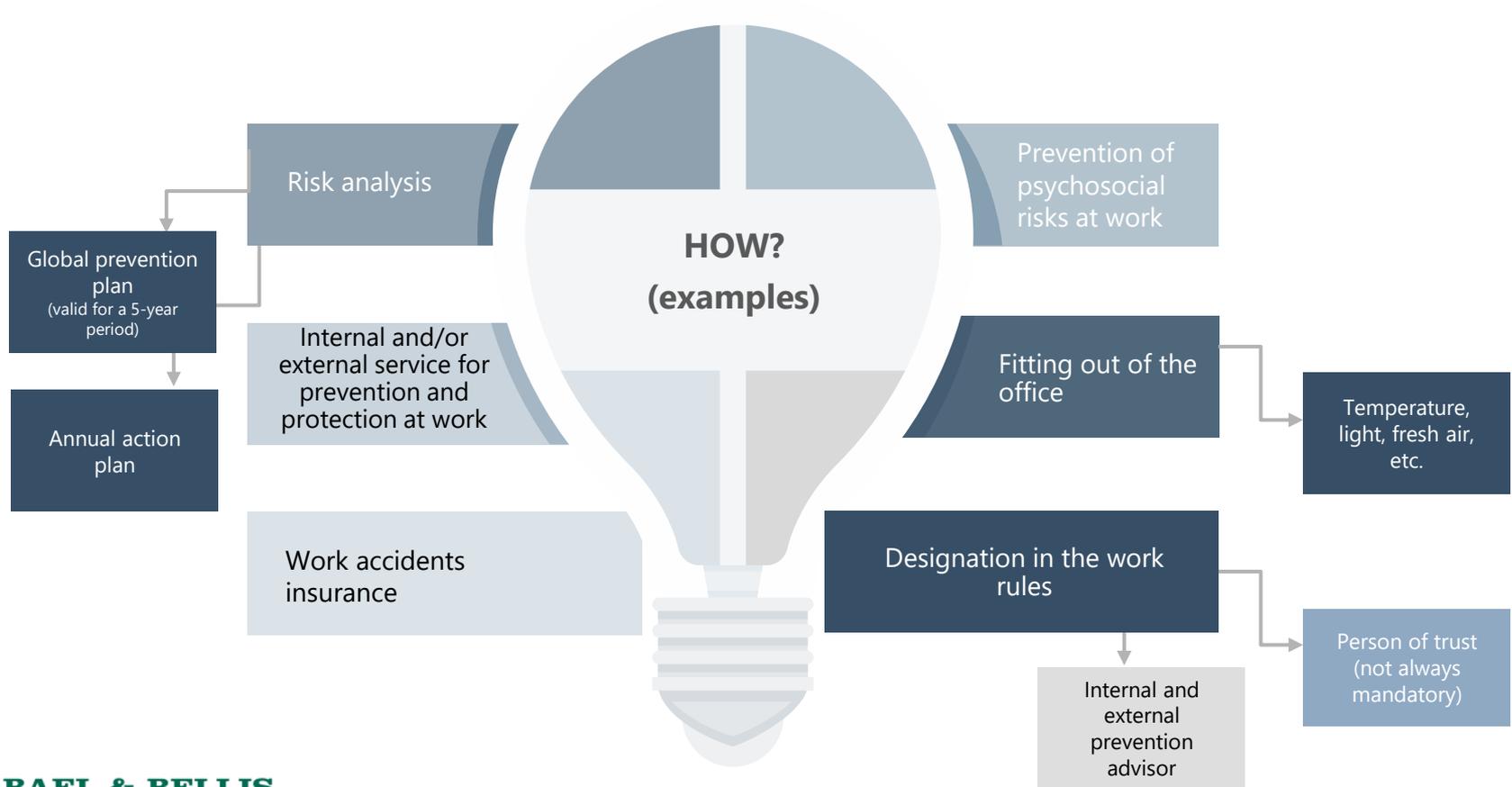
Health & Safety at work



The SIRS/SIOD
 (Service d'information et de recherche sociale / Sociale Inlichtingen- en Opsporingsdienst)
carries out audits frequently

Taking care of employee health & safety at the workplace (in general)

Health & Safety at work



Taking care of employee health & safety at the workplace During Covid-19 – if telework cannot be applied

ENSURE

maximum compliance with the rules on social distancing and the prevention of Covid-19 contaminations

OBSERVE

general guidelines and sectoral guidelines and/or specific protocols at all times

PREVAIL

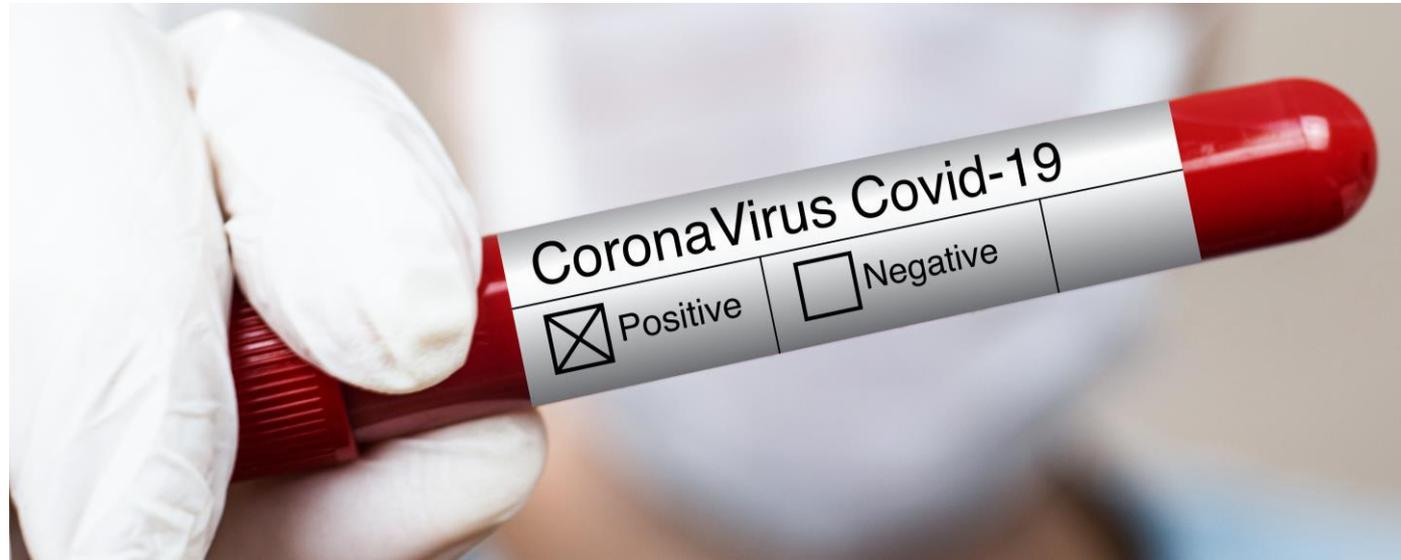
collective employment measures over individual measures

GIVE

appropriate training to employees

TAKE

H&S measures, together with employees' representatives and services for prevention and protection at work.



Taking care of employee health & safety at the workplace (examples)



Put sanitizing gel at employees' disposal



Display posters on walls
(available on SPF's website)



Ensure social distance /
use plexiglass



Impose wearing of a
mask in common areas



Afin d'aider les entreprises dans la reprise progressive des activités économiques, les partenaires sociaux du Conseil supérieur pour la prévention et la protection au travail, en concertation avec la Cellule stratégique de la ministre de l'Emploi et des experts du SPF Emploi ont rédigé un [guide générique \(PDF, 7.96 Mo\)](#).

Ce guide fournit un cadre avec des mesures qui peuvent être adaptées par les différents secteurs et par chaque employeur à leurs spécificités afin de garantir que les activités puissent reprendre dans les conditions les plus sûres et les plus saines possibles. En attendant d'éventuels guides sectoriels ou protocoles élaborés par les commissions paritaires, les entreprises peuvent déjà se baser sur les principes généraux tels que repris dans le guide générique.

Ci-dessous, vous trouverez les secteurs pour lesquels un guide sectoriel ou un protocole a été élaboré sur base d'une décision collective des membres d'une commission paritaire :

- 100 - Ouvriers: [déclaration \(PDF, 125.27 Ko\)](#)
- 109 - Secteur de l'habillement et de la confection (CP 109 et CP 215): [déclaration \(PDF, 110.21 Ko\)](#)
- 110 - Entretien du textile: [Guide sectoriel des laveries automatiques \(PDF, 555.13 Ko\)](#), [guide sectoriel du nettoyage à sec \(PDF, 620.28 Ko\)](#) et [guide sectoriel des grandes blanchisseries \(PDF, 1.17 Mo\)](#)
- 111 - Secteur du métal et de la technologie (CP 111 et CP 209): [accord sectoriel \(PDF, 211.7 Ko\)](#)
- 112 - Secteurs métal et mobilité, distribution, réparation et entretien (CP 112 (garages), CP 149.02 (carrosserie) et CP 149.04 (commerce du métal)): [guide sectoriel \(PDF, 769.73 Ko\)](#) et [recommandations \(PDF, 186.47 Ko\)](#)
- 115 - Secteur de l'industrie verrière: [recommandations \(PDF, 248.4 Ko\)](#)
- 116 - Secteur de l'industrie chimique (CP 116 et CP 207): [recommandations \(PDF, 180.81 Ko\)](#)
- 118 - Secteur de l'industrie alimentaire (CP 118 et CP 220): [guide sectoriel \(PDF, 1.19 Mo\)](#) (update 13/1)
- 120 - Secteur textile (CP 120 et CP 214): [protocole sectoriel \(PDF, 240.05 Ko\)](#)
- 121 - Secteur du nettoyage: [déclaration \(PDF, 109.34 Ko\)](#)
- 124 - Secteur de la construction: [protocole additionnel et fiche de prévention \(PDF, 1.8 Mo\)](#)
- 125 - Secteur du bois (CP 125 et SCP 125.01, 125.02 et 125.03): [Protocole sectoriel \(PDF, 402.26 Ko\)](#)
- 126 - Ameublement et Industrie transformatrice du bois: [protocole sectoriel \(PDF, 1.33 Mo\)](#) et [checklist \(PDF, 550.06 Ko\)](#)
- 127 - Secteur du commerce de combustibles: [directives \(PDF, 229.37 Ko\)](#)
- 129 - Secteur de fabrication du papier et carton (CP 129 et CP 221): [recommandations \(PDF, 37.76 Ko\)](#)
- 130 - Secteur de l'imprimerie, des arts graphiques et des journaux: [déclaration paritaire \(PDF, 265.93 Ko\)](#)
- 136 - Secteur de transformation du papier et carton (CP 136 et CP 222): [étapes à suivre \(PDF, 1.4 Mo\)](#)
- 140.03 - Secteur du transport de marchandises et de la logistique: [déclaration \(PDF, 133.6 Ko\)](#)

Poll questions: please answer

Can an employer oblige his employees to get vaccinated against Covid-19 ?

Yes

No

Which fines may be levied in the event of non-compliance with health and safety rules as a result of Covid-19

(e.g., in the event of non-compliance with social distancing or lack of hygiene measures) ?

A warning only

Administrative fines

Administrative or criminal fines

Poll questions: answers

Can an employer oblige his employees to get vaccinated against Covid-19 ?

Yes

No

No

- the vaccination is not mandatory
- this decision is a privacy related decision
- vaccination information = sensitive personal data

Which fines may be levied in the event of non-compliance with health and safety rules as a result of Covid-19

(e.g., in the event of non-compliance with social distancing or lack of hygiene measures) ?

A warning only

Administrative fines

Administrative or criminal fines

Administrative or criminal fines of up to EUR 4,000 per employee concerned (with a maximum of 100)



Catherine Longeval

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Sara Beutels

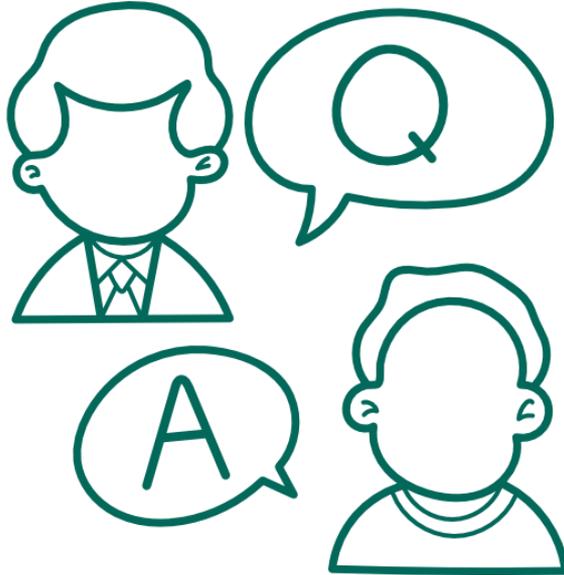
Counsel
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Manon Denis

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Thank you for your attention!



Questions?