



Checklist: Preparing the company for inspection of Rospotrebnadzor in Russia

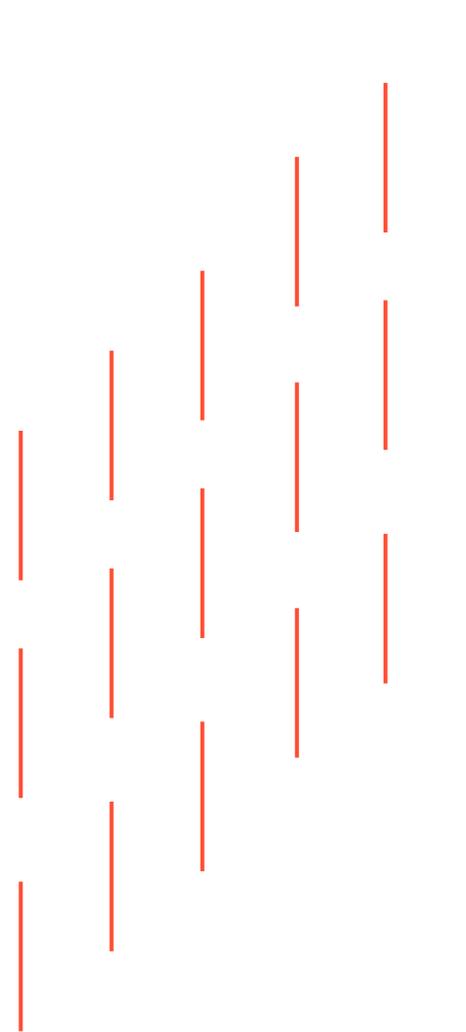
ALRUD

Checklist: Preparing the company for inspection of Rospotrebnadzor in Russia

Dear Ladies and Gentlemen!

Due to massive inspections and new sanitary requirements, ALRUD's experts have prepared this material for HR directors, compliance officers and heads of legal departments, on the preparation of the company, for inspection of the Federal Service for Surveillance on Consumer Rights Protection and Human Wellbeing (Rospotrebnadzor). It covers the main steps to be taken to prepare your company for an inspection, a list of violations to which Rospotrebnadzor gives special attention, and a list of possible consequences.

Please note that regional regulations may substantially differ, depending on the epidemiological situation in each region. *Please, additionally, monitor the local requirements of the Russian region in which your company operates.*



Preparing the company for inspection of Rospotrebnadzor

Verification of compliance with sanitary and epidemiological requirements



Regular conduct of:

- cleaning with disinfectant
- non-contact measurement of the body temperature of employees, including before the start of the working day and during the working shift
- surveys on the health status of employees and the health of persons living with them
- Organization of **immunization** of employees against influenza



It is also necessary to follow the recommendations of Rospotrebnadzor, the wording of which contains the expressions "**recommended**" and "**expedient to organize and implement**", etc.



Availability of **sufficient quantity** of:

- air disinfection devices (must correspond to the area of the company's premises)
- disposable masks and gloves for all employees (enough for at least 5 days)
- antiseptic for hands
- disinfectants (enough for at least 5 days, considering the area of the company's premises)



Please note that for some industries (for example, trade, public catering, construction), in addition to general regulations, **special recommendations** have been established.

3 *Source: Letter of Rospotrebnadzor dated 10.03.2020 No. 02/3853-2020-27;
Resolution of the Chief State Sanitary Doctor of the Russian Federation dated
21.07.2021 No. 20*

Preparing the company for inspection of Rospotrebnadzor

Verification of compliance with sanitary and epidemiological requirements



The company **has**:

- documents confirming the purchase of masks
- certificate of registration of disinfectant
- contact/non-contact thermometers
- marking on cleaning equipment



- Social distancing** is observed
- Employees **wear** and **change** masks when appropriate



Rospotrebnadzor may initiate an unscheduled inspection. Therefore, it is necessary to check **in advance** that the company complies with all requirements.



The company has **adopted** :

- a log, or schedule, for fixing cleaning with disinfectants;
- temperature measurement log and recording measurements for all employees
- order to appoint a person responsible for preventive measures
- instruction on the entry to the employer's territory

*Sources: Letter of Rospotrebnadzor dated 10.3.2020 No. 02 /853-2020-27;
Letter of Rospotrebnadzor dated 23.1.2020 No. 02/770-2020-32;
Letter of Rospotrebnadzor dated 21.10.2020 No. 02/21694-2020-30;
Resolution of the Chief State Sanitary Doctor of the Russian Federation
dated 28.9.2020 No. 28*

Preparing the company for inspection of Rospotrebnadzor

Main violations for coronavirus prevention



Failure to clean with disinfectant

In course of the inspection, the company may be required to provide **a log, or schedule, for fixing the cleanings**, as well as **a log of the preparation of the disinfection solution**.

Lack of devices for air disinfection

Devices must cover the **entire area** of the premises, including the locations of **visitors** to the company (for example, in sales areas, common halls).

Lack of marking, or improper storage, of cleaning equipment

Insufficient supply of disinfectants

Antiseptics must be **registered**. In the course of the inspection, the company may be required to provide the relevant certificates.



Insufficient supply of masks

Employees do not wear masks

In course of the inspection, inspectors can record a violation if they **see** employees without personal protective equipment.

Lack of thermometers, daily temperature measurement log for all employees



Social distancing is not provided (at least 1 - 1.5 meters)

Person responsible for preventive measures was not appointed

The lack of an order in the company to appoint a person responsible for preventive measures, may be considered a violation.



Preparing the company for inspection of Rospotrebnadzor

During the inspection



- **Check** the documents (certificates, order to conduct an inspection, etc.)
- **Accompany** inspectors and make sure that they **do not go beyond** the subject of the inspection



- Provide all the **required information**
Inspectors **have no right** to demand information, documents, equipment, products, etc., which are not related to the subject of inspection.



- Control the **term of the inspection**
An inspection should take **no more than 20 business days**. If the company conducts its activities in different regions, the total term **cannot exceed 60 working days**. If the verification period has expired, inspectors **are not entitled** to continue the inspection.

Consequences



- **Statement** with the requirement to eliminate violations
After the expiration of the period, specified in the statement, Rospotrebnadzor has the right to order a repeated, unscheduled inspection.
- Protocol on an **administrative offense** in relation to a company, an official (for example, General Director).



- **Fine** for an official – from 50,000 to 150,000 Roubles;
- **Fine** for the company – from 200,000 to 500,000 Roubles, or **suspension of activities** for up to 90 days.

Contacts:



Irina Anyukhina

Partner
Head of Labour and
Employment practice

E: ianyukhina@alrud.com



Elena Chershintseva

Associate, Ph.D in Law
Labour and Employment

E: echershintseva@alrud.com

We hope you find this checklist useful!

ALRUD specialists have extensive expertise and will be glad to provide any legal support concerning the preparation of the company for inspection by Rospotrebnadzor, including the examination of the company's compliance with all the requirements, drafting all necessary documents that are necessary from the perspective of federal and regional regulations.

