

## Public Consultation on Guidance for Remote Working

### ***Irish Exporters Association submission to the Department of Enterprise, Trade and Employment***

**7 August 2020**

---

#### **1. Introduction**

The Irish Exporters Association (herein the Association) takes note of the 2019 publication of the research paper *Remote Work in Ireland*. The Association welcomes that the Department of Enterprise, Trade and Employment has taken note of the research paper's recommendations and has come forward with this public consultation on *Guidance for Remote Working* for both employers and employees. The call for submissions on remote working is timely given that an increased amount of the Irish workforce is working from home due to the pandemic and that this trend is likely to continue for some time into the future. The top priority for employers is the health, safety and wellbeing of its employees and this needs to guide the Department's work.

The Association would like to emphasise that the mechanics and operations of trade means that essential supply chain workers, both in manufacturing and logistics, are unable to work remotely. The Association's diverse membership means that we represent both essential supply chain workers and remote workers. The Association recognises that employers have certain responsibilities towards their employees regardless of whether an employee works remotely and given that remote working and the uptake of it will continue, a national guidance document as a point of reference would benefit both employers and employees. The Association however also acknowledges that there are costs, challenges and benefits to both employer and employee from remote working, and these need to be assessed in the round.

#### **2. Key considerations**

- Regardless of the sector, future policies that impact the Irish workforce need to take account of the unique aspects and increased number of workers engaging in remote working.
- The Association would like to stress that a great portion of remote working is currently taking place in homes. This important point needs to be reflected in the Department's guidance document and taken account of in the policy developments that follow.

- Examining the allowances for working from home, whether through the tax system or via the voluntary employer allowance of €3.20 per workday. Consideration needs to be given to the fact that the employer allowance is an extra cost to doing business, which many employers may not be in a position to pay because of the impact of the pandemic on their business, and as many companies will likely move to a blended working environment over the medium term, with a mixture of working at home and in the office, this will only serve to increase the costs of doing business on the employer. However, we also recognise the impact of increased household bills of employees working at home, but this needs to be taken in the round of reduced commuting and subsistence costs because of not having to work in the office. We would call on the Department to commission a report on the financial impact of remote working on employee's overall cost of working and that appropriate and proportionate employee relief through the Revenue Commissioners is made available to employees so as not to increase the burden of costs on the employer.
- The expansion of the hub network with high speed broadband connectivity, that is in line with health and safety and confidentiality rules, should be considered as a feasible remote working solution for employers. We would call on the Department to consider the further expansion of the hub network in the guidance document.
- From an economic, social, and environmental point of view, having vibrant rural areas is in all our interests. Continued remote working has the potential to enable workers work from and remain in rural areas. High speed broadband in rural areas is crucial to ensuring that remote working is carried out as seamlessly as possible. The knock-on effect over the medium and long-term may reduce the need for costly living accommodation in cities.
- We welcome the new guidance that was released from several sources to advise employers and employees on the practicalities of short-term homeworking during the pandemic. Given that the short-term aspect is due to be more medium to long-term for certain parts of the workforce, we could call on the Department to ensure that Government guidance and requirements are merged and presented in one point of reference for the benefit of both employees and employers.

### **3. Conclusion**

The guidance on remote working needs to be a living and holistic document that can be updated to suit circumstances as they arise. The guidance needs to transcend Government policies that impact the Irish workforce and needs to be relevant in both the current COVID-19 pandemic and in a time when a vaccine/effective treatment is found, administered and taken up.