




Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1081877	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1082943
Business name (Company name):	Moulton Bulb Company Ltd		
Site name:	Moulton Bulb Company Ltd		
Site address: <i>(Please include full address)</i>	Long Lane Moulton Spalding Lincolnshire PE12 6PP	Country:	United Kingdom
Site contact and job title:	Sam Avill, Technical Manager and Health & Safety Co-ordinator		
Site phone:	01406 370380	Site e-mail:	Sam.avill@oldershawgroup.co.uk
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	17 th -18 th April 2019		

Audit Company Name & Logo: Bureau Veritas CPS 	Report Owner (payee): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Moulton Bulb Company Ltd
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Wendy Ingrey

Team auditor: N/A

Interviewers: Wendy Ingrey

Report writer: Wendy Ingrey

Report reviewer: Samantha Zeng

Date of declaration: 18 April 2019

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Non-Compliance Table

Issue	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)	Record the number of issues by line*:			NC	Obs	GE	NC Findings Only (note to auditor, summarise in as few words as possible NC's only)	
		ETI Base Code	Local Law	Additional Elements					Customer Code
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		1	0	<ul style="list-style-type: none"> Ob <ul style="list-style-type: none"> Site to implement policy to cover human rights impacts and communicate this to all appropriate parties, including its own suppliers.
0B	Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	3	<ul style="list-style-type: none"> GEs <ul style="list-style-type: none"> Good coverage of Code, dignity at work policies and Stronger Together issues at the induction Workplace by Facebook communication system is in place enabling generic and group specific messaging, knowledge base, idea generation etc. to take place. Some sample interviewed workers had joined and management are working towards increased coverage. The system also allows multi-lingual translations so this can be used by everyone in the factory. Introduction of computerised training which will mean more focused training, identifying

									progression opportunities and monitoring refresher training.
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
2	<u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
3	<u>Safety and Hygienic Conditions</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1	2	1	<p>NC</p> <ul style="list-style-type: none"> - Risk assessment and staff training required for Silicone Spray. PPE not issued in line with MSDS instructions. <p>OBs</p> <ul style="list-style-type: none"> - Site to review manual fire alarm system (hand held air horn). It was noted from the fire drill record for 19th March 2019 that 20 workers in the NIR Grader area did not evacuate because they did not hear the horn. - It was noted that despite extraction measures to manage the level of onion fumes in the Peeling Department, workers sometimes wore full face protection together with ear protection throughout their shift. <p>GE</p> <ul style="list-style-type: none"> - Good partnership with Cope Safety Management who attend the site regularly to assist and advise on safety matters. Reports are produced advising on actions and regular review of accident rates.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	2	0	<p>OBs</p> <ul style="list-style-type: none"> - It was noted that Staffline workers who met the 12 weeks AWR criteria had not been paid the same rate as directly employed comparators. During the audit Staffline sent documented confirmation that back pay would be calculated and paid on Friday 26th April 2019. - Obtain correct CCTV signage showing purpose and contact details and display at the entrances to the site.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A

General observations and summary of the site:

There are good systems in place to meet Code compliance particularly through a recently extended HR function. Several employee engagement initiatives are under way and management are keen to develop these further. A recent staff survey has highlighted areas which management are using to

benchmark and focus future activity. Safety matters are overseen by Cope Safety Management and the Site Technical Manager/Health & Safety Co-ordinator.

The site continues to develop since the last audit in 2017, the processing area has been extended and refurbished to create more space for working. The packhouse has a new canteen and office facility, and re-piping of toilet waste to biodigestion is currently underway. Imminent plans are in place to repair yard wear and tear following which the pedestrian walkways will be repainted.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details																						
A: Company Name:	Moulton Bulb Company Ltd																					
B: Site name:	Moulton Bulb Company Ltd																					
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	Certificate of Employers Liability Moulton Bulb Company Limited & Moulton Bulb Imports Limited & MBC Limited t/a Goldwood Moulton Policy No. 10251241 Expiry date 30 th May 2019																					
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Grading, packing and processing fresh produce																					
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Total size of the site was 16500 square metres with 2 main buildings and several storage and warehouse areas. Site is approximately 65 years old with the latest building housing the grader built in 2014. Main building structure comprises brick/metal/concrete cladding. Facility is located in a rural area near the main town of Spalding, Lincolnshire.</p> <table border="1"> <thead> <tr> <th>Building No. 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1/2</td> <td>Packhouse, staff facilities, despatch and coldstores</td> <td></td> </tr> <tr> <th>Building No. 2</th> <th>Description</th> <th></th> </tr> <tr> <td>Floor 1</td> <td>Warehouse and graders</td> <td></td> </tr> <tr> <th>Building No. 3</th> <th>Description</th> <th></th> </tr> <tr> <td>Floor 1/2</td> <td>Processing area and main offices. An additional 3 storage areas at the rear of the site</td> <td></td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table> <p>Visible structural integrity issues (large cracks) observed and without structural engineer evaluation</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No Details: None observed</p>	Building No. 1	Description	Remark, if any	Floor 1/2	Packhouse, staff facilities, despatch and coldstores		Building No. 2	Description		Floor 1	Warehouse and graders		Building No. 3	Description		Floor 1/2	Processing area and main offices. An additional 3 storage areas at the rear of the site		Is this a shared building?	No	
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<p>F: Site function:</p>	<p> <input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor </p>
<p>G: Month(s) of peak season: (if applicable)</p>	<p>December</p>
<p>H: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i></p>	<p>The site grades, packs and processes onions, garlic, shallots, carrots and celery. Main equipment comprises 21 packing lines, separate grading lines and 3 processing lines, 5 extraction units and a fleet of fork lift trucks and pedestrian operated trucks.</p>
<p>I: What form of worker representation / union is there on site?</p>	<p> <input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None </p>
<p>J: Is there any night production work at the site?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p>
<p>K: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on-site accommodation. </p>
<p>L: Are there any off site provided worker accommodation buildings</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers </p>
<p>M: Were the site provided accommodation buildings included in this audit</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details: N/A </p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 8.15 am Day 1 Time out: 4.30 pm	Day 2 Time in: 8.15 am Day 2 Time out: 4.00 pm	Day 3 Time in: Day 3 Time out:
B: Number of Auditor Days Used:	1 auditor x 2 days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 3 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Sam Avill, Site Technical Manager and Health & Safety Co-ordinator		
H: Is further information available (if Y please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	12 th July 2017		
J: Previous audit type:	Follow up		
K: Was any previous audit reviewed during this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	No worker representatives at the site.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No union representatives at the site.		

Worker Analysis

“ The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	70	0	0	121	0	20	0	211
Worker numbers – female	28	0	0	89	0	29	0	146
Total	98	0	0	210	0	49	0	357
Number of Workers interviewed – male	1	0	0	9	0	2	0	12
Number of Workers interviewed – female	1	0	0	10	0	3	0	14
Total – interviewed sample size	2	0	0	19	0	5	0	26

A: Nationality of Management	British
B: Majority nationality of workers	Main countries: Country 1: Lithuania approx. 40% total workforce Country 2: UK approx. 35% total workforce Country 3: Poland approx. 15% total workforce Country 4: Other approx. 10% total workforce
C: Worker remuneration (<i>management information</i>)	0% workers on piece rate 80% hourly paid workers 20% salaried workers Payment cycle: % daily paid 80% weekly paid 20% monthly paid % other – please give details

Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Code information posted and included in new starter induction
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 2 Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	New canteen become too warm. It was noted management were aware of it and were taking measures.
I: What did the workers like the most about working at this site?	Shift patterns
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Positive
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If Yes, please give details: Food Safety Culture and Employee Engagement Survey which the site will use for benchmarking and future action.</i>	

M: Attitude of workers:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Many of the sampled workers had been at the site for several years. The sample included maternity, first aid, fire marshall and agency workers together with representation from different areas of the site. All appeared happy to take part in the process. Feedback was largely positive. Examples were given where workers could approach their supervisors or managers with any concerns. There were no complaints and about poor treatment at the site and many stated they had open access to their first line managers and HR office.

N: Attitude of worker's committee/union reps:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Not applicable. No committee nor union representatives currently although management stated they would be looking at reinstating a worker representative committee.

O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

All those involved in the audit were very helpful and friendly. Documentation was well organised and easily available.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to NC-table\)](#)

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

The site does not have a separate formal policy on human rights. However, the area of labour rights, where the business has the most impact, is covered by various policies and procedures which are described throughout the audit report. In particular, a comprehensive Ethical Policy and HR Policy on Preventing Hidden Labour Exploitation details due diligence steps taken to address slavery and human trafficking across the business and its supply chains. The Head of HR is the designated person responsible for implementing standards concerning Human Rights. Several confidential helplines are posted. Suppliers are required to be members of SEDEX and complete the SAQ and this is the primary tool used to manage supplier compliance. The site is located in a rural area away from built up residential areas and has minimal impact on the surrounding farm land.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Management and employee interviews; site tour

HR policies and procedures

Site Ethical Policy

HR Policy on Preventing Hidden Labour Exploitation

Employee Handbook

Induction programme

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: However, other ethical policies and procedures cover commitment to respecting human rights issues</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Lucy Oldershaw Job title: Head of HR</p>
<p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Whistle Blower policy, grievance policy and other independent confidential helplines which are posted.</p>
<p>D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Employee data is kept secure under the management of HR in lockable cabinets or computerised information with restricted access.</p>

Findings	
<p>Finding: Observation <input checked="" type="checkbox"/> Customer NC <input type="checkbox"/></p> <p>Site to implement policy to cover human rights impacts and communicate this to all appropriate parties, including its own suppliers.</p> <p>ETI/Additional elements: 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>Comments: It was noted the site had other policies and procedures which reflected their commitment to human rights issues in the business and its supply chain. Management agreed to review this observation.</p>	<p>Objective evidence observed: Management and employee interviews; site tour and document review.</p>

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed.</p>	<p>Objective Evidence Observed: Not applicable</p>

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: 22.3%	This year 18.8%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5.33%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year: 3.5%	This year: 3.23%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	3.8%	4.28%
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Recorded in accident book and reviewed regularly	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Last year: 26 Number: 10.83	This year: 6 Number: 1.9
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Q1 2.5 Q2 2.5 Q3 4.1 Q4 1.6	Q1 1.9
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: 3.9%	This year: 0.6%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months 1.38% workers	12 months 0.69% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months 0% workers	12 months 0% workers

OB: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with
- 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.4 Suppliers are expected to communicate this Code to all employees.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Management are fully aware of the ETI Base Code and this is communicated to staff through the recently revised new starter induction together with posted information on notice boards. Elements of the Code are also included in the Employee Handbook. The site has good systems in place to deliver Code compliance and management are keen on continuous improvement with new initiatives being introduced all the time. Site is an A/B Sedex member and suppliers are required to be SEDEX members plus complete the SAQ. The Head of HR is the senior member of management responsible for Code compliance. Site has good systems in place to deliver Code compliance.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- General site tour, management and employee interviews
- Safety and HR related policies and procedures
- Employee training and employment documentation
- Site Ethical Code
- HR Policy on Preventing Hidden Labour Exploitation

Any other comments: None

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

- Yes
 - No
- Please describe: Nil

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

- Yes
 - No
- Please describe: Comprehensive range of dignity at work related policies and procedures

<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Information is included in the Employee Handbook, new starter induction and also posted on notice boards.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Attendance at Stronger Together related workshops</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Management interviews and policy requirements</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Head of HR with supporting HR and training staff</p>
<p>H: Is there a senior person /manager responsible for implementation of the Code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Head of HR</p>
<p>I: Is there a policy to ensure all worker information is confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: DP Policy</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Worker information is controlled by restricted personnel access, locked areas and password protected computer system.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Safety matters affecting employees are risk assessed on a regular basis.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Control and review measures form part of the risk assessment and are reviewed regularly.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Site requires suppliers to be SEDEX members and subscribe to the ETI Code.</p>

Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Site land is owned by Directors and not leased.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: N/A
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A

Non-compliance:	
Description of non-compliance: None Observed	Objective evidence observed: Not Applicable

Observation:	
Description of observation: None Observed	Objective evidence observed: Not Applicable

Good Examples observed:

Description of Good Example (GE):

1. Good coverage of Code, dignity at work policies and Stronger Together issues at the induction.
2. 'Workplace by Facebook' communication system is in place enabling generic and group specific messaging, knowledge base, idea generation etc to take place. Some sample interviewed workers had joined and management are working towards increased coverage. The system also allows multi-lingual translations so this can be used by everyone in the factory.
3. Introduction of computerised training (Learning Management System) which will mean more focused training, identifying progression opportunities and monitoring refresher training. Agency staff will be included in this system.

Objective evidence observed:

Management and employee interviews; document review and site tour

1: Freely Chosen Employment

[\(Click here to return to NC-table\)](#)

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

There is no evidence of the facility using forced, bonded or involuntary prison labour. There is no retention of original identification documentation and no deposits are left with management. Employment contracts provide details of notice arrangements when staff leave.

Evidence examined – to support system description:

Details:

Worker and Management interviews

Site Tour

Employment contracts

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details and category of workers affected</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected</p>
<p>C: Is there Any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:</p>
<p>E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement.' F: Is there a modern day slavery statement published</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Policy on Preventing Hidden Labour Exploitation covering Modern Slavery and due diligence is posted on the company website and available in the Employee Handbook.</p>

	<input type="checkbox"/> Not applicable
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details and category of workers affected: Management have attended Stronger Together events and more are planned. <input type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Formal recruitment procedures are in place and HR management are keen to increase awareness through inclusion of Stronger Together material in the staff induction. There are good links between management and workers and this continues to be a feature of ongoing communication initiatives.

Non-compliance:	
Description of non-compliance:	Objective evidence observed:
None Observed	Not Applicable

Observation:	
Description of observation:	Objective evidence observed:
None Observed	Not Applicable

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
None Observed	Not Applicable

2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

No worker nor union representation arrangements in place although management are reviewing the reinstatement of a worker representative body which had petered out through lack of interest or people nominating themselves or others as representatives. There appeared to be open communication structures at the site and sampled workers stated they could freely approach their supervisors/managers to raise any concerns.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Employee and management interviews
Site tour
Grievance procedures

Any other comments: None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there any other form of effective worker/management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>communication channel? (Other than union/worker committee) e.g. H&S, sexual harassment</p>	<p>Describe: There is an open-door policy at the site. Many of the sampled workers stated they could go to the HR Office and felt able to approach their supervisors/managers for any issues.</p> <p>Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>There is no union</p>	<p>Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If no union what is parallel means of consultation with workers e.g. worker committees?</p>	<p>Ongoing direct communication</p>	<p>Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>N/A</p>
<p>I: Were worker representatives freely elected?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Date of last election: N/A</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>N/A</p>
<p>K: Were worker representatives/union representatives interviewed</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: N/A</p>	
<p>L: State any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>N/A</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p>	
<p>N: If Yes what percentage by trade Union/worker representation</p>	<p>___% workers covered by Union CBA N/A</p>	<p>___% workers covered by worker rep CBA N/A</p>
<p>O: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p>	

Non-compliance:	
Description of non-compliance: None Observed	Objective evidence observed: Not Applicable

Observation:	
Description of observation: None Observed	Objective evidence observed: Not Applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

3: Working Conditions are Safe and Hygienic

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Safety matters overseen by Cope Safety Management consultants and Site Technical Manager/Health & Safety Co-ordinator. Quarterly safety meetings held with Cope. On site engineering departments provide PPM and breakdown maintenance at the site with support from external contractors where necessary. Large canteen with access to drinking water and vending machines in place. Sufficient washrooms available and no complaints received from sampled workers regarding cleanliness. Health & Safety policy included in the Staff Handbook. Comprehensive induction includes good coverage of a wide range of safety issues.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Management and employee interviews; site tour

Safety matters included in induction

Training records (manual and computerised using the new LMS system (Learning Management System)

Portable appliance testing by external contractor January 2018 – overdue but documented order placed and awaiting date from contractors.

Accidents recorded and reviewed

Last recorded fire drills 19th March 2019 8 pm and 11.15 am.

Electrical Installation Condition Report with remedial action – next review due 28.02.21

External Contractors Torien Services Ltd maintain refrigeration systems

Packhouse extractor machinery serviced by external contractor Nicholsons; filters replaced bi-annually

Fork lift trucks (leased and owned) sampled for start up checks and maintenance

PPE provided where necessary and hearing health surveillance in place for those wearing mandatory ear protection

Cope Management Safety reports from visits in December 2018 and April 2019

Any other comments: None

<p>A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Safety systems communicated via induction and ongoing training</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Some are included in the Handbook, whilst the main policies are covered on induction and ongoing training</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details:</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Ear Protection and Hi-Viz</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: Dedicated medical room with supplies; defibrillators also available</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Trained first aid staff across the site and included in sample interviews</p>
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: No worker transport provided by the site</p>
<p>H: Secure personal storage space is provided for workers in their living space and is fit for purpose</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: No accommodation or living space provided</p>

<p>I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Risk assessments are in place and currently under review</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: See Environmental section for further details.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Customer requirements are monitored by the technical department.</p>

<p style="text-align: center;">Non-compliance:</p>	
<p>Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Risk assessment and staff training required for Silicone Spray. PPE not issued in line with MSDS instructions.</p> <p>ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment</p> <p>Recommended Corrective Actions: Risk assessments and SOPs to be completed.</p> <p>Action by: Sam Avill</p> <p>Timeframe: 60 days</p>	<p>Objective evidence observed: Management and employee interviews; sit tour and document review</p>

<p style="text-align: center;">Observation:</p>	
<p>1. Description of observation: Site to review manual fire alarm system (hand held air horn). It was noted from the fire drill record for 19th March 2019 that 20 workers in the NIR Grader area did not evacuate because they did not hear the horn.</p> <p>ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising</p>	<p>Objective evidence observed: Worker and management interviews; site tour and document review</p>

<p>out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment</p> <p>Comment: It should be noted there were no objections to the current manual system from the site's external safety advisors or insurers.</p> <p>2. Description of observation: It was noted that despite current extraction measures to manage the level of onion fumes in the Peeling Department, workers sometimes wore full face protection together with ear protection throughout their shift. Issue also referenced during worker interviews.</p> <p>ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment</p> <p>Comments: Management stated that at the end of April 2019 further measures were being implemented to manage the fumes.</p>	
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Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>Good partnership with Cope Safety Management who attend the site regularly to assist and advise on safety matters. Reports are produced advising on actions and regular review of accident rates.</p>	<p>Objective Evidence Observed: Management interviews and document review</p>

4: Child Labour Shall Not Be Used

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

There was no evidence of child labour at the site. The facility verifies permanent employee ages by requesting a form of identification a copy of which is saved on file. 26 HR records were reviewed and copies of relevant ID were available.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Worker and management interviews

Site Tour

HR files including copies of right to work and proof of age documents

Any other comments: None

A: Legal age of employment	16 years with restrictions
B: Age of youngest worker found:	18
C: Children present on workforce but not working at time of audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details: N/A

Non-compliance:	
Description of non-compliance: None Observed	Objective evidence observed: Not Applicable

Observation:	
Description of observation: None Observed	Objective evidence observed: Not Applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

5: Living Wages are Paid

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[\(Click here to return to Key information\)](#)

ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Employment contracts give full information on pay, pay intervals and overtime working. The minimum wage at the site complies with the current National Living Wage. All staff including agency workers are provided with itemised payslips and wages are paid directly into workers' bank accounts. Deductions are statutory and there was no evidence of wages being deducted as a disciplinary measure.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Management and employee interviews

Employment contracts

Copy payslips

Time & Attendance records

Any other comments: None.

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
<p>A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: A maximum of 48 hours per week normally averaged over 17 weeks. Individuals can choose to 'opt out' of this limitation.</p>	<p>Between 38.5 and 42 hours per week depending on the shift pattern</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: No maximum overtime hours are stated in UK law</p>	<p>8.32 hours per week</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>D: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>From 1st April 2019 £8.21 per hour for adults aged 25 and over</p>	<p>Actual minimum wage found in the sample £8.21 per hour</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E: overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: There is no legal requirement for the payment of a premium wage for overtime in UK. Overtime pay should be at least the hourly rate of pay</p>	<p>133% on standard hourly rate after basic contracted hours</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: If No , why not?	N/A	
C: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 x April 2019 (recent) 26 x December 2018 (peak) 26 x June 2018 (random)	
D: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	From 1st April 2019 £8.21 per hour – 25 years old and over
E: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If No , please give details:
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: Note: full time employees and please state hour / week / month etc. £8.21 per hour	Please indicate the breakdown of workforce per earnings:
	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	0% of workforce earning under min wage 70% of workforce earning min wage 30% of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: None noted <i>Note: full time employees and please state hour / week / month etc.</i>	
H: What deductions are required by law e.g. social insurance? Please state all types:	PAYE and National Insurance	
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please describe	

J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: No evidence or feedback that workers are not paid for all hours worked. Payment system is computerised and transparent.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered Yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please specify amount/time: The living wage is currently set at £9.75 an hour in London and £8.45 an hour in the rest of the UK. The living wage is an informal benchmark, not a legally enforceable minimum level of pay. The living wage is currently calculated by the Centre for Research in Social Policy at Loughborough University, the London living wage has been calculated by the GLA since 2005. It is promoted by the Living Wage Foundation.
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Statutory requirement
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: Rates of pay are currently in accordance with statutory rates which are normally reviewed on an annual basis.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Both genders in sample undertaking the same work
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:

6: Working Hours are not Excessive

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

There are a variety of shifts across the site including the main patterns of 4 on 4 off – 11 hour shifts with 2 x 20 minutes paid break and 2 x 30 minute unpaid break; 4 on 4 off – 12 hour shifts with 2 x 20 minute paid breaks and 1 x 30 minute unpaid break; and, Monday to Friday – 8 hour shifts with 1 x 20 minute paid break and 1 x 30 minute unpaid break. Sampled workers stated overtime was infrequent and worked on a voluntary basis. Any overtime hours are paid at 133%. All staff receive at least one day off per week, normally two on the Monday to Friday shift. It was noted that the overtime rate was increased to double time to encourage workers to attend on key days during the peak.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Management and worker interviews

Employment contracts

Sample copy payslips and working hours

Any other comments: There was no evidence of excessive hours being worked

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective evidence observed:

Not Applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)		
Systems & Processes		
A. What timekeeping systems are used: time card etc.	Describe: Timesheets are completed by agency staff; direct employees use electronic system.	
B: Is sample size same as in wages section	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details: N/A	
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Details: Agency contracts are based on variable hours	
D: Are there any other types of contracts/employment agreements used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, please complete as appropriate:	
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input checked="" type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
	If "Other", Please define:	
	N/A	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y please %detail hours, % and types of workers & affected and frequency Details: N/A	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	6 days	

Standard/Contracted Hours worked		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, please give details In UK working hours can be averaged over a 17 week period
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	8.32 per week on a 40 hour per week contract
J: Combined hours (standard/contracted plus overtime = total) 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours	4%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: Overtime is voluntary
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of standard wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency: 133% after basic hours depending on the shift
O: ETI Code requires a prevailing standard to give greatest worker protection.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	

<p>If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<p>Please explain any checked boxes above e.g. detail of consolidated pay CBA or Other</p> <p>N/A</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<p> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p> <p>Please explain any checked boxes above</p> <p>N/A</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No N/A </p>

7: No Discrimination is Practiced

[\(Click here to return to NC-table\)](#)

ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Policies and procedures in place prohibiting discrimination. Equal Opportunities policy and procedure is referenced in the induction. Vacancies are advertised on notice boards. No issues raised during interviews about discriminatory practices.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Management and employee interviews
- Site tour
- HR policies and procedures
- Induction programme

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 60% Female: 40%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	#: Various supervisory and technical roles
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement No evidence of discrimination found

Professional Development

A: What type of training and development are available for workers?	Please give details: Training is linked to the job and/or personal development
---	--

B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: Established recruitment and selection procedures in place
---	---

Non-compliance:	
Description of non-compliance: None Observed	Objective evidence observed: Not Applicable

Observation:	
Description of observation: None Observed	Objective evidence observed: Not Applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

8: Regular Employment Is Provided

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

At site level the Head of HR oversees compliance with local law and practice. Employment contracts are comprehensive and understandable and provided prior to commencing employment. All sampled workers confirmed they had received employment terms and offer letters prior to starting work at the site. Many of the sampled workers had joined on a temp to perm basis. There was no evidence of jobs recruitment fees being paid. Management have agency audit processes in place together with service level agreements with the two labour providers. The site has formal recruitment and selection procedures and vacancies were posted on notice boards.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Management and worker interviews

Site tour

Agency audit documentation

HR files including employment contracts

Service level agreements with both labour providers

Any other comments: None

Non-compliance:	
Description of non-compliance: None Observed	Objective evidence observed: Not Applicable

Observation:	
1. Description of observation: It was noted that Staffline workers who met the 12 weeks AWR criteria had not been paid the same rate as directly employed comparators. During the audit, Staffline sent documented confirmation that back pay would be calculated and paid on Friday 26th April 2019. ETI requirement: 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Comments: None	Objective evidence observed: Management and employee interviews; site tour and document review
2. Description of observation: Obtain correct CCTV signage showing purpose and contact details, and display at the entrances to the site. ETI requirement: 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Comments: None	

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions

	If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes Please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other:
C: If any checked, give details:	N/A

Migrant Workers:	
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	No distinction in work undertaken between UK and migrant workers
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Two Total number of (outside of local country) recruitment agencies used: None directly
C: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: N/A
D: Are any migrant workers in skilled, technical, or management roles	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	If Yes number and example of roles: Supervision and Quality Control (included in interview sample)
---	---

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A There are no 'non-employee' workers.
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other
C: If any checked, give details:	/A

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	2 And names if available: Staffline and Proforce
B: Were agency workers' age/pay/hours included within scope of this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Service agreements in place with both labour providers</p>
<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: Active GLAA checks; both labour providers are on SEDEX; Staffline had SMETA audit in December 2018 and Proforce will be having a third party audit in June 2019. HR management also carry out sampling checks on agency workers.</p>

<p style="text-align: center;">Contractors:</p> <p style="text-align: center;"><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: If Y, how many contractors are present</p>
<p>B: If Yes, how many workers supplied by contractors</p>	<p>N/A</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding: N/A</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>N/A</p>

8A: Sub-Contracting and Homeworking

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting : auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Management stated there was no subcontracting or homeworking.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Factory Tour

Management interview

Worker interview

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective evidence observed:

Not Applicable

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details:		
B: Number of homeworkers	Male:	Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents	If through agents, number of agents:	
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to NC-table\)](#)

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Choice of independent and confidential helplines</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Posted and included in induction through Stronger Together presentation</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Hotline and Whistleblowing</p>
<p>D: Is there a grievance mechanism in place for:</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Details: Written grievance procedures in place</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: None divulged or identified during the audit process</p>
<p>F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: Grievance procedures are in line with current codes of practice and legislation</p>
<p>G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g., help lines or whistle blowing mechanism</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details: Site offers the grievance facility to employees only. Supply chain management includes the requirement to be SEDEX members.</p>

H: Is there a published and transparent disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain
I: If yes, are workers aware of these the disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no please give details
J: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

No evidence of harsh or inhumane treatment. Grievance and disciplinary procedures in place. Dignity at work related policies and procedures in place and included in the employee handbook. Feedback regarding treatment at the site was positive and no concerns were raised during interviews. Relevant policies also included in the induction programme.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Details
- Employee handbooks and contracts
- HR policies and induction programme
- Management and worker interviews
- Site tour

Any other comments: None

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

**Objective evidence
observed:**

Not Applicable

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Site has systems in place to review proof of right to work documentation. Copies are maintained in HR files and originals are returned to workers. Relevant documents were available for all sampled workers.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Employee and management interviews

HR files, employment contracts and right to work documents

Any other comments: Records well maintained

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective evidence observed:

Not Applicable

10. Other issue areas 10B2: Environment 2–Pillar

[\(Click here to return to NC-table\)](#)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Site uses registered waste removal contractors to manage waste streams including recyclable, residual and hazardous (engineering waste) items. Onion waste is composted. The water treatment plant is monitored by the local water authority. The site has internal and external waste management designated areas. Energy use is monitored and records were available over several years. The factory and external areas were clean and tidy.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Site tour, management and employee interviews

Registration documentation for BIFFA (CBDU104360), Harkenn Ltd (CBDU135199), S.G. Boswell & Sons (CBDU97326)

Site energy usage records

Any other comments: None

Non-compliance:

Description of non-compliance:

None Observed

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable
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Other Findings Outside the Scope of the Code










None observed

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None divulged

Photo Form

		
<p>Entrance to Reception area</p>	<p>Automatic grader</p>	<p>Packing</p>
		
<p>Staff notice board</p>	<p>Canteen area</p>	<p>Typical fire escape</p>
		
<p>Observation - Peeling and PPE</p>	<p>Observation - Peeling and PPE</p>	<p>Observation - current CCTV signage</p>



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

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