WELCOME TO SA8000:2014 Awareness Session





ROURKELA STEEL PLANT HRD CENTRE

SCOPE OF SA



- Protects Basic Human Rights of All Personnel within a Certified Organisation's Influence & Control
- Over 3400 certified Organisations in 66 Countries

Background of SA8000



- 1997: Creation of Council on Economic Priorities Accreditation Agency (CEPAA)
- Its Purpose was to address rising public concern about inhumane working conditions in developing countries & to draw up a universal code of practice for labour conditions in manufacturing industry ,Understanding the needs and expectations of interested parties
- In 2000, CEPAA became known as Social Accountability International (SAI), a new entity whose remit was to develop voluntary standards governing social responsibility, and to certify companies that agreed to meet them.
- The first such standard is SA8000 published in 2001, which governs employees' working conditions. Presently it is SA8000:2014

SA8000 Certification Process



- The terms of SA8000 were drafted by an advisory board comprising 25 experts from a wide range of backgrounds, including businesses, trade unions and non-governmental organizations.
- Now that the code has been finalized, SAI is overseeing the certification of companies that have expressed a desire to become SA8000-compliant.
- Certification is carried out by a handful of independent auditors, who are accredited by SAI. Written guidance and training courses have been created to help auditors undertake this function.

Benefits of SA8000



- Ensures organization's commitment to social accountability and to treating its employees ethically and in compliance with global standards.
- Improves the management and performance of supply chain w.r.t SA requirements.
- Allows organizations to ensure compliance with global standards and reduce the risk of malpractice, public exposure and possible litigation.
- Supports corporate vision and build and reinforce the loyalty of the employees, customers and stakeholders, which in turn impacts the bottom line positively.

Important Definitions



- Child: Any person less than 15 years of age, unless local minimum age for work or mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality
- Young Worker : Any worker over the age of a child as defined above and under the age of 18.
- Child Labour: Any work performed by a child younger than the age(s) specified in the above definition of a child, except as provided for by ILO recommendation 146.
- **Worker :** All non-management personnel
- Forced Labour: All work or service that a person has not offered to do voluntarily and is made to do under the threat of punishment or retaliation, or is demanded as a means of repayment of debt.
 - Home worker: A person who is contracted by the company or by a supplier, sub-supplier or sub-contractor, but does not work on their premises.

Important Definitions



- Human Trafficking: The recruitment ,transfer, harboring or receipt of persons, by means of the use of threat, force, other forms of coercion, or deception for the purpose of exploitation.
- Remediation of Child Labourers: All support and actions necessary to ensure safety, health, education and development of children who have been subjected to child labour, as defined above, and whose work has been terminated.
- Supplier/Subcontractor: An entity or individuals in the organization with goods or services integral to , utilised in or for the production of the organisation's goods or services.
- Sub-supplier: An entity or individual(s) in the supply chain that provides the supplier with goods or services integral to, utilised in or for the production of the organisation's goods or services.

Important Definitions



- Interested Party: An individual or group concerned with or affected by the social performance of the company.
- Worker Organisation : An autonomous voluntary association of workers organised for the purpose furthering & defending the rights & interests of the workers.
- SA 8000 Worker Representative : A worker chosen to facilitate communication with the senior management on matters related to SA 8000, undertaken by the recognized trade union(s) in unionized facilities and, elsewhere, by a worker elected by non-management personnel for that purpose.
- Social Performance : An Organisation's achievement of full & sustained compliance with SA8000 while continually improving.
- Stakeholder Engagement : The participation of interested parties , including but not limited to the Organisation , trade unions , workers , worker organisations , suppliers , contractors , buyers , consumers , Investors , NGOs , media and local & Govt officials
- Risk Assessment : A process to identify the health , safety & labour policies and practices of an Organisation and to prioritise associated risks.

What is SA8000?



- SA 8000 certification enables organizations to demonstrate their commitment to social accountability standards as well as employee and customer satisfaction.
- It can be applied to any company, of any size, anywhere in the world.
- The 9 areas it addresses include :
 - Child Labour

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- Forced and Compulsory labour
- Health and Safety
- Freedom of Association and Right to Collective Bargaining
- Discrimination
- Disciplinary Practices
- Working Hours
- Remuneration
- Management System

SA 8000 Elements



1.Child Labour	 No workers to be employed under the age of 15. In case child labour is found, suitable remediation action need to be taken.
2. Forced or Compulsory Labour	 No forced labour, no withholding of salary, no 'forced' deposits or lodging identification papers upon commencement of work.
3. Health & Safety	Provide a safe and healthy work environment; take steps to prevent injuries, regular health and safety training, system of detecting threats to health and safety, access to clean toilet facilities and potable water, creation of health & safety committee.
4. Freedom of Association & Collective Bargaining	Respect the right to form and join trade unions and bargain collectively and the organisation is open to dialogue with trade unions and demonstrates good faith in bargaining with trade unions

SA 8000 Elements(Contd.)



5. Discrimination	• No discrimination based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age.
6. Disciplinary Practices	 No corporal punishment, mental or physical coercion or verbal abuse.
7. Working Hours	Comply with the applicable law but, in any event, not more than 48 hours per week with at least a one day off for every seven day period; voluntary overtime paid at a premium rate and not to exceed 12 hours per week on a regular basis. Overtime may be allowed if it is part of a collective bargaining agreement.
8. Remuneration	Wages paid for a standard work week must meet the legal and industry standards (BNW) and should be sufficient to meet the basic need of workers and their families with no disciplinary deductions. Overtime, if any, to be paid at premium rate.

SA 8000 Elements(Contd.)

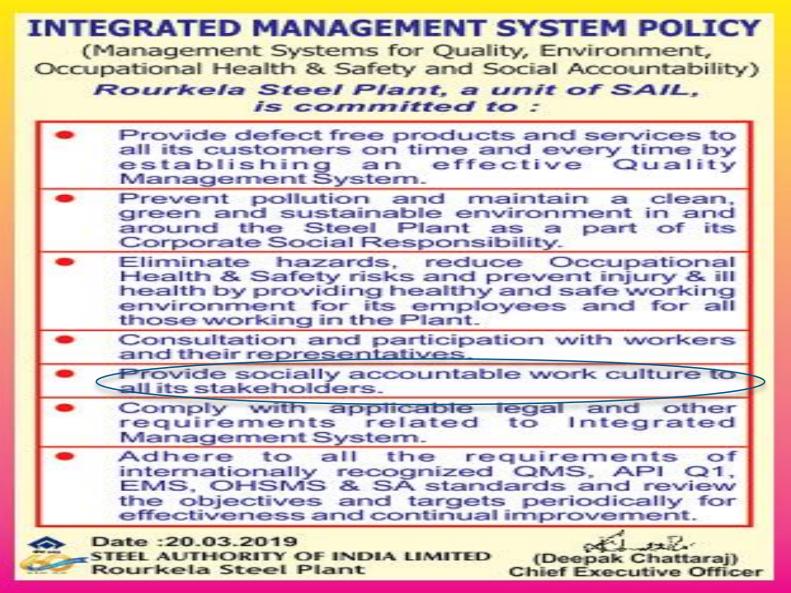


System

- 9. Management SA Policy , Procedures and Records, Social Performance Team, Identification and Assessment of Risks, Monitoring, Internal Involvement and Communication, Complaint Management and Resolution, External Verification and Stakeholder Engagement, Corrective and Preventive Action, Training and Capacity Building, Management of **Suppliers and Contractors**
 - •The policy must be defined in writing in worker's own language, publicly available, reviewed regularly, effectively documented and implemented.
 - Regular Review & Implementation of Management **System**

IMS Policy





SA 8000:2014 Documents



- SA 8000:2014 Manual
- 12 nos of Procedures :
 - Child Labour
 - Forced and Compulsory labour
 - Health and Safety
 - Freedom of Association and Right to Collective Bargaining
 - Discrimination
 - Disciplinary Practices
 - Working Hours
 - Remuneration
 - > CAPA
 - Identification & Assessment of Risks
 - Grievance & Complaint Management
 - > Management of Suppliers & Contractors
- Risk Assessment & Contingency Plan

Other Important Elements



Social Performance	 SPT is a balanced representation of SA 8000 Worker Representatives and Management. 						
Team	• Role of SPT :						
	conducts Periodic written risk assessment						
	monitors workplace activities						
	facilitates routine internal audit						
	holds periodic meetings to review progress						
	and take action against non-conformities.						
Risk	• SPT members document risk assessment procedures for						
Assessment	assessing relevant risks for all elements of SA8000.						
	• The scope of the risk assessment includes internal business operations and processes, as well as						
	suppliers/subcontractors, private employment agencies and sub-suppliers.						

SOCIAL PERFORMANCE TEAM



Sl.no	Name	Design	Remarks							
	Management Representatives									
1.	R Khan	GM(P&A)	Chairman							
2.	S Acharya	DGM I/c(SEF)	MR(Safety)							
3.	B Kullu	DGM I/c(PI) Works	Member							
4.	Ms Bijaya Mishra	DGM(PI) Non-Works	Member							
5.	T G Kanekar	DGM (PI)	SA Coordinator							
6.	Dr T Mishra	Jt Dir(OHSC)	MR(Health)							
7.	D Satapathy	DGM(BE & IED)	Convener							
	l	Norker Representative	25							
1.	P C Mohanty	Sr Tech(Cr Maint)	Member							
2.	Ms Reeta Rani Swain	Sr Tech(CED)	Member							
3.	B Das	EASA (PR)	Member							
4.	Gopinath Mohapatra	Sr Tech (CRM)	Member							
5.	S S Mahanta	SOST , SMS II	Member							
6.	R C Samanta	Sr Tech(PD)	Member							

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Rourkela Steel Plant SA 8000: 2014 :Risk Assessment & Contingency Plan

1	Criteria	Pro	bability Of Occurrence (P)		Severit	y (S)		Possibility Of Detection (D)			LEVEL	Legend	
1	00010	Renta	5 F	Vory R	Sec.		-	Likely		High (H)	RPN ≥ 64 RPN - Risk Pric		Imper
	02	Rare		Minor				ssible				RPN=PXSXU	
	03	Unike	ly	Signific	ant		Un	Unikely		Medium (M)	24 ≤ RPN < 64		-
	04	Possio	ile	Critical			Ra	are					
	05	Likely		Catastr	rophic.		Re	erone		Low (L)	RPN < 24		DELLA DICO
SL	PROC	ESS	IDENTIFIED RISK		RI	SK PRIO	RITY NU	JMBER	RISK	CONT	ROL	RESPONSIBILITY	REMARKS
NO	AREA 8	SUB-			P	S	D	RPN (PICSUD)	LEVEL				
1,	Canteen Manager		Child Labour		2	4	2	16	Low	Adhar & Voter ID Verification		Canteen Vo	
2	Outsourc	and a set of the set o	Forced & Compulsory La	bour	4	2	2	16	Low	Regular Awareness Trainin workers	g to contractors & contract	1	
	J005		Lack of Healthy & Safe V Environment	Vorking	3	2	3	18	Low	Implementation of HIRA Health & Safety Trg Provision of PPE Health Checkup of Cont Review of Health & Safe ZSC & Dept Review Provision of Clean Toile	ract Employees ety Conditions by CSC ,	PL-CLC/ SED/ CD/ OHSC / UPEs	
3	Regular	Jobs	Lack of access to Trade	Unions	2	3	1	6	Low	Regular Communication		PI-IR&R	
			Discrimination at Workpl	ace	3	3	2	18	Low	Company Policy , Recruitm Committee	ent Policy , Complaints	PI-IR&R , CD , PI- OD , Complaints Committee	
			Unfair Disciplinary Practi	ices (4	2	2	16	Law	CDA, Standing Orders		PI-OD,CD, IR&R	/
GN & C (P Sr	Khan) ((P&A) Chairman(SP C Moltanty) Tech (Cr Mai Memebr(SPT	257 nt)	(S Acharya) DGM I/c(SFE) & MR(SAFETY) (Ms R R Swain) Sr Tech(CED) & Memcbr(SPT)	(R.) DGM & Me (Bisw Sr Ex	Misra)	Works) PT) 2 IS) R)	(0	(Ms B DGM I & Mei Jopmath I Sr Tec	Misra) /c(PL-NW nber(SPT) Loft a L Mohapatri h(CRM) nebr(SPT)	& Member(SPT)	S II) Sr Te	& Member(SPT	

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SL. PROCESS NO AREA & SUE		IDENTIFIED RISK	RISK PRIORITY NUMBER RIS		RISK	- CONTROL	Income	-		
4	ACTIVITY		P	S -	D	RPN	LEVEL	- CONTROL	RESPONSIBILITY	REMAR
4.	Outsourced Jobs	High Working Hour	4	3	1	12	Low	Counseling & Awareness , Monitoring of Wage Sheets Enforcement of premium O/T rates Attreament of Local Could Automate	PI-CLC/CD	-
		Low Remuneration	3	4	- -	10	LUW	Counseling & Awareness , Monitoring of Wage Sheets Enforcement of statutory wage rules Bank Payment Enforcement of premium O/T rates	PI-CLC/CD	
	Jobs at Suppliers Premises	Deviations from SA Requirements	3	3	2	18	Low	BNW Calculation & Awareness Commitment during Registration/ Re-Registration Obtaining periodic commitment from the suppliers Frequency based inspection at supplier premises	MM-PIVD	
	Management System	Absence of Policies & Procedures	3	2	3	18	Law	Pundve Actions Documented Policies & Procedures Display & Communication at important locations Keeping appropriate records	BE/CD	
		Absence of structured SPT	3	3	2	18	Low	Management Reviews Approved structured Committee with uniform representation from Management & Union Conducting periodic SPT Review	SPT/BE	
	_	Absence of Proper Mechanism for Complaint Management	2	2	3	12	Low	Communicating follow up action to all concerned Procedure for Grievance/Complaint Management Implementation of above procedure	OD/IR&R/Compla	
Para		Lack of Awareness on SA Requirements	3	3	2	18	Low	Regular IMS Awareness Session (Employees) Regular SA Awareness Session (contract Labours) GM/HOD Review SPT Meeting Display of Poster / KM Portal / IMS Card etc. Suppliers through different forum		
C Mol Tech (C) (5) D	S Acharya) (R Mi GM Uc(SFE) DGM Uci R(SAFETY) & Memb R(SAFETY) (Ms R R Swain) (Bis	(PL-W er(SP swaja	T) Das) (PR)		(Gopinat Sr Ti	isra) PL-NW)	CD - Concerned Department ,CDA- Cooduct Di (T.G.Kanekar) (Dr (T.Mishra) DGM(PL) Sr DD(OHSC) & Member(SPT) & MR(Health) itra) (S S Mahahta) SOST(SMS II)	(D Saterathy) DGM(BE) & Member(SPD) (R C Samanta) Sr Tech(PD) & Member(SPT)	+

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Social Finger Print



- A set of tools that Organisations use to measure and improve their Management Systems for Worker's rights & Workplace conditions
- It breaks a Management System into
 > 10 Process based categories
 > 5 Maturity Levels
- The 3 main tools are
 - Self Assessment
 - Independent Evaluation
 - Rating Chart

SFP Philosophy



- Create a Baseline Philosophy
- Identify strong & Weak Areas
- Prioritise key areas & make improvements
- Measure again and compare with Baseline

SFP Process



- Before the Certification Audit Organisation takes Self Assessment online
- During the Audit First CB conducts audit , then lead auditor completes the independent evaluation
- After the Audit CB identifies areas of improvement . Organisation makes necessary changes to improve compliance

Why SFP is a part of SA8000?



- It develops a direct relationship between SAI & Certified Organisation so that SAI can :
 - Collect and analyse data about certified organisations
 - Create targeted training & guidance
 - Conduct impact assessment of SA8000
- Focuses on Capacity Building before Certification :
 - Provides a consistent methodology to assess if Organisations are ready for SA8000 Certification
 - If not ready encourages capacity building to address weakness
- Emphasizes continual improvement during certification :
 SAI, CB & Organisations can track progress
 SAI can provide targeted guidance to improve SA8000 compliance

SFP Levels



- 5 Mature Management System with continued improvements
- 4 Developed Management System implemented consistently and regularly
- 3 Developed but not fully implemented
- 2 Partially Developed
- 1 No Awareness of SA 8000



SA 8000 Audit Report

Annexure 4:

Social Fingerprint Score Analysis:

Social Fingerprint Pointers	Self-Assessment Score	Independent Assessment Score
9.1 Policies, Procedures & Records	4.7	4.2
9.2 Social Performance Team	4.0	4.0
9.3 Identification & Assessment of Risk	4.0	3.6
9.4 Monitoring	4.1	3.6
9.5 Internal involvement & communication	4.3	4.0
9.6 Complaint Management & Resolution	4.1	3.4
9.7 External Verification & Stakeholder Engagement	3.4	3.4
9.8 Corrective and Preventive Actions	4.2	3.7
9.9 Training & Capacity Building	4.0	3.8
9.10 management of Suppliers & Contractors	3.6	3.3
Total Score	4.0	3.7



SA 8000 Requirements



1. CHILD LABOUR



- **1.1** The Organisation shall not engage in or support the use of child labour as defined above
- **1.2** The Organisation shall establish , document , maintain and effectively communicate to personnel and other interested parties , written policies and procedures for remediation of child labourers , and shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child as defined above.
- **1.3** The Organisation may employ young workers, but where such workers are subjected to compulsory education laws, they shall work only outside of school hours. Under no circumstances shall any young worker's school, work & transportation time exceed a combined total of 10 hours per day and in no case shall young workers work more than 8 hours a day. Young workers may not work during night hours.
- **1.4** The Organisation shall not expose children or young workers to any situations in or outside of the workplace that are hazardous or unsafe to their physical & mental health & development





- 2.1 The Organisation shall not engage in or support the use of forced or compulsory labour, including prison labour, as defined in Convention 29, shall not retain original identification papers and shall not require personnel to pay ' deposits' to the Organisation upon commencing employment.
- 2.2 Neither the Organisation nor any entity supplying labour to the Organisation shall withhold any part of any personnel's salary, benefits, property or documents in order to force such personnel to continue working for the Organisation.
- **2.3** The Organisation shall ensure that no employment fees or costs are borne in whole or part by workers.
- **2.4 Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment provided that they give reasonable notice to their organisation**
- **2.5** Neither the Organisation nor any entity supplying labour to the Organisation shall engage in or support human trafficking.



3. HEALTH & SAFETY



- **3.1** The Organisation shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential health & Safety incidents and occupational injury or illness arising out of , associated with or occurring in the course of work . It shall minimise or eliminate , so far as is reasonably practicable , the causes of all hazards in the workplace environment , based upon the prevailing safety & health knowledge of the industry sector and of any specific hazards.
- **3.2** The Organisation Shall assess all the workplace risks to new expectant and nursing mothers including those arising out of their work activity to ensure that all reasonable steps are taken to reduce any risks to their Health & Safety.
- **3.3** Where hazards remain after effective minimisation or elimination of the causes of all hazards in the workplace environment, the organisation shall provide personnel with appropriate personal protective equipment as needed at its own expense. In the event of a work-related injury, the Organisation shall provide first aid and assist the worker in obtaining follow-up medical treatment.

3. HEALTH & SAFETY (Contd.)



- **3.4** The Organisation shall appoint a Senior MR to be responsible for ensuring a safe & healthy workplace environment for all personnel and for implementing this standard's Health & Safety requirements.
- 3.5 A Health & Safety Committee, comprised of a well-balanced group of management representatives and workers shall be established and maintained. Unless otherwise specified by law, at least one worker member(s) of the committee shall be by recognised trade union representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers shall appoint a representative(s) as they deem appropriate. Its decision shall effectively communicated to all personnel. The committee shall be trained & retained periodically in order to be competently committed to continually improving the health & safety conditions in the workplace. It shall conduct formal, periodic occupational health & safety risk assessments to identify and address current and potential health & safety hazards. Records of these assessments & CAPA shall be kept.



3. HEALTH & SAFETY (Contd.)



- 3.6 The Organisation shall provide to personnel, on a regular basis, effective health & safety training, including on-site training and, where needed, job-specific training. Such training shall also be repeated for new and reassigned personnel, where incidents have occurred, and when changes in technology and/or the introduction of new machinery present new risks to the health & safety of the personnel.
- **3.7** The Organisation shall establish documented procedures to detect, prevent, minimise , eliminate or otherwise respond to potential risks to the health & safety of personnel. The Organisation shall maintain written records of all health & safety incidents that occur in the workplace and in all residences and property provided by the Organisation , whether it owns , leases or contracts the residences or property from a service provider.
- **3.8** The Organisation shall provide ,for use by all personnel , free access to clean toilet facilities , potable water , suitable spaces for meal breaks and where applicable , sanitary facilities for food storage.
- **3.9** The Organisation shall ensure that any dormitory facilities provided for personnel are clean, safe and meet their basic needs, whether it owns, leases or contracts the dormitories from a service provider.
- **3.10** All personnel shall have the right to remove themselves from imminent serious danger without seeking permissions from the Organisation.

4. FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING



- 4.1 All personnel shall have right to form and join trade unions of their choice and to bargain collectively on their behalf within the Organisation. The Organisation shall respect this right and shall effectively inform personnel that they are free to join a worker organisation of their choosing without any negative consequences or retaliation from the Organisation(s) or collective burgaining.
- 4.2 In situations where the right to freedom of association and collective bargaining are restricted under law, the organisation shall allow workers to freely elect their own representatives.
- **4.3** The Organisation shall ensure that union members, representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation or retaliation for being union members representatives of workers or engaged in organising workers, and that such representatives have access to their members in the workplace.





5. DISCRIMINATION

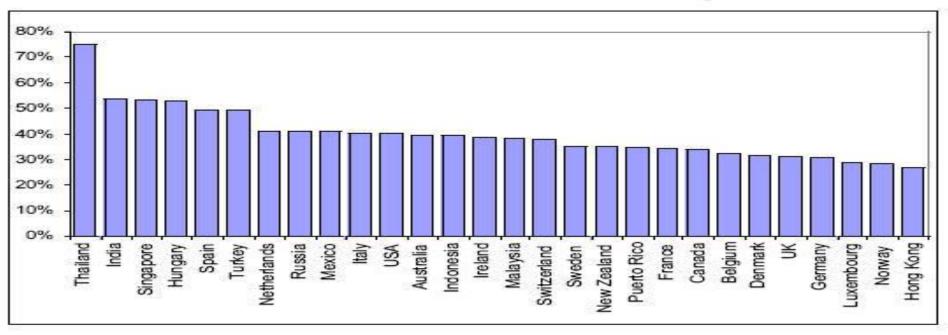


- 5.1 The Organisation shall not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinion, age or any other condition that could give rise to discrimination
- 5.2 The Organisation shall not interfere with the exercise of personnel's right to observe tenets or practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinion, age or any other condition that could give rise to discrimination.
- 5.3 The Organisation shall not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact, in the workplace and in all residences and property provided by the organisation whether it owns, leases or contracts the residences or property from a service provider.
- **5.4** The Organisation shall not subject personnel to pregnancy or virginity tests under any circumstances.

6. DISCIPLINARY PRACTICES



6.1 The Organisation shall treat all personnel with dignity and respect. The Organisation shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.



Rate of discrimination while working



7. WORKING HOURS



7.1 The Organisation shall comply with applicable laws , collective bargaining agreements (where applicable) and industry standards on working hours , breaks and public holidays. The normal work week , not including overtime , shall be defined by law but shall not exceed 48 hours.

- 7.2 Personnel shall be provided with at least one day off following every 6 consecutive days of working . Exceptions to this rule apply to only where both of the following conditions exist :
 - * National Law allows work time exceeding this limit &
 - A freely negotiated collective bargaining agreement is in force that allows work time averaging , including adequate rest periods
- 7.3 All overtime work shall be voluntary , except as provided in 7.4 below , shall not exceed 12 hours per week and shall not be requested on a regular basis.
- 7.4 In cases where overtime work is needed in order to meet the short term business demands and the Organisation is party to a freely negotiated collective bargaining agreement representing a significant portion of its workforce, the Organisation may require such overtime work in accordance with such agreement. Any such agreement must comply with the other requirements of this working hour element.



8. REMUNERATION



- 8.1 The Organisation shall respect the right of personnel to a living wage and ensure that wages of a normal work week, not including overtime, shall always meet at lest legal or industry minimum standards or collective bargaining agreements (where applicable). Wages shall be sufficient to meet the basic needs of personnel and to provide some discretionary income.
- 8.2 The Organisation shall not make deductions from wages for disciplinary purposes. Exception to this rule applies only when both of the following conditions exist :
 - a) Deductions from wages for disciplinary purposes are permitted by national law and
 - b) A freely negotiated collective bargaining agreement is in force that permits this practice
- 8.3 The Organisation shall ensure that personnel's wages and benefits composition are detailed clearly and regularly to them in writing for each pay period. The Organisation shall lawfully render all wages and benefits due in a manner convenient to workers, but in no circumstances in delayed or restricted forms, such as vouchers, coupons or promissory notes

8. REMUNERATION



- 8.4 All overtime shall be reimbursed at a premium rate as defined by national law or established by a collective bargaining agreement . In countries where a premium rate for overtime is not regulated by law or there is no collective bargaining agreement , personnel shall be compensated for overtime at the Organisation's premium rate or at a premium rate equal to prevailing industry standards , whichever is higher.
- 8.5 The Organisation shall not use labour-only contracting arrangements, consecutive short term contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labour and social security.

9. MANAGEMENT SYSTEM



1.0 Policies , Procedures & Records	6.0 Complaint Management & Resolution
2.0 Social Performance Team	7.0 External Verification & Stakeholder Engagement
3.0 Risk Assessment	8.0 Corrective & Preventive Action
4.0 Monitoring	9.0 Training & Capacity Building
5.0 Internal Involvement & Communication	10. Management of Suppliers & Contractors

9.1. POLICIES, PROCEDURES & RECORDS



- 9.1.1 Senior Management shall write a Policy Statement to inform personnel, in all appropriate languages, that it has chosen to comply with SA8000.
- 9.1.2 The Policy statement shall include the Organisation's commitment to conform to all the requirements of SA8000 standard and to respect the international instruments as listed in the previous section on Normative Elements and their interpretation. The statement shall also commit the organisation to comply with : national laws and other requirements to which the Organisation subscribes.
- 9.1.3 The Policy statement & the SA8000 standard shall be prominently and conspicuously displayed, in appropriate and comprehensive form, in the workplace and in residences and property provided by the organisation, where it owns, leases or contracts the residences or property from a service provider.
- **9.1.4** The Organisation shall develop policies and procedures to implement the SA 8000 standard.

9.1. POLICIES, PROCEDURES & RECORDS(contd.)



- 9.1.5 These Policies and Procedures shall be effectively communicated and made accessible to personnel in all appropriate languages
- 9.1.6 The Organisation commitment to conform to all the requirements of SA8000 standard and to respect the international instruments as listed in the previous section on Normative Elements and their interpretation. The statement shall also commit the organisation to comply with : national laws and other requirements to which the Organisation subscribes.
- 9.1.7 The Organisation shall regularly conduct a management review of its policy statement, policies, procedures implementing this standard and performance results, in order to continually improve.
- **9.1.8 The Organisation shall make its policy statement publicly available in an effective form and manner to interested parties , upon request.**

9.2 SOCIAL PERFORMANCE TEAM



- 9.2.1 A Social Performance Team(SPT) shall be established to implement all elements of SA8000.The team shall include a balanced representation of :
 - SA8000 Worker representative(s) and
 - Management

9.2.2 In unionised facilities, worker representation on the SPT shall be by recognised trade union(s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers may freely elect one or more SA8000 worker representative(s) from among themselves for this purpose. In no circumstances shall the SA8000 worker representative(s) be seen as a substitute for trade union representation.

9.3 IDENTIFICATION & ASSESSMENT OF RISK



- 9.3.1 The SPT shall conduct periodic written risk assessments to identify and prioritise the areas of actual or potential nonconformances to this standard. It shall also recommend actions to senior Management that address these risks. Actions to address these risks shall be prioritised according to their severity or where a delay in responding would make it impossible to address.
- 9.3.2 The SPT shall conduct these assessments based on their recommended data and data collection techniques and in meaningful consultation with interested parties.

9.4 MONITORING



9.4.1 The SPT shall effectively monitor workplace activities for :

- Compliance with this standard
- Implementation of actions to effectively address the risks identified by SPT and
- For the effectiveness of systems implemented to meet the organisation's policies and the requirements of this standard.
- It shall have the authority to collect information from or include interested parties(stakeholders) in its monitoring activities. It shall also liaise with other departments to study, define, analyse and/or address any possible non-conformance(s) to the SA Standard
- **9.4.2** The SPT shall also facilitate routine internal audits and produce reports for senior management on the performance and benefits of actions taken to meet the SA8000 standard , including a record of corrective & preventive actions identified.
- **9.4.3** The SPT shall also hold periodic meetings to review progress and identify potential actions to strengthen implementation of the standard.

9.5 INTERNAL INVOLVEMENT & COMMUNICATION



9.5.1 The Organisation shall demonstrate that personnel effectively understand the requirements of SA8000, and shall regularly communicate the requirements of SA8000 through routine communication

9.6 COMPLAINT MANAGEMENT & RESOLUTION



- 9.6.1 The Organisation shall establish a written grievance procedure that is confidential, unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace and / or non-conformances to the SA8000 standard.
- 9.6.2 The Organisation shall have procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace and /or non-conformances to this standard or of its implementing policies and procedures. These results shall be freely available to all personnel and, upon request, to interested parties.
- 9.6.3 The Organisation shall not discipline, dismiss or otherwise discriminate against any personnel or interested party for providing information on SA8000 compliance or making other workplace complaints.

9.7 External Verification & Stakeholder Engagement



- 9.7.1 In the case of announced and unannounced audits for the purpose of certifying its compliance with the requirements of this standard , the Organisation shall fully cooperate with external auditors to determine the severity and frequency of any problems that arise in meeting the SA8000 standard.
- 9.7.2 The Organisation shall participate in Stakeholder Engagement in order to attain sustainable compliance with the SA8000 standard.

9.8 Corrective & Preventive Actions



- 9.8.1 The Organisation shall formulate policies & procedures for the prompt implementation of Corrective & Preventive Actions and shall provide adequate resources for them . The SPT shall ensure that these actions are effectively implemented.
- 9.8.2 The SPT shall maintain records, including timelines, that list , at minimum non-conformances related to SA8000, their root causes, the Corrective & Preventive Actions taken and implementation results.

9.9 Training & Capacity Building



9.9.1 The Organisation shall implement a training plan for all personnel to effectively implement the SA8000 standard as informed by the results of risk assessments. The Organisation shall periodically measure the effectiveness of training and record their nature & frequency.

9.10 Management of Suppliers & Contractors



- 9.10.1 The Organisation shall conduct due diligence on its suppliers/subcontractors, private employment agencies and subsuppliers' compliance with the SA8000 standard. The same due diligence approach shall be applied when selecting new suppliers / subcontractors, private employment agencies and sub-suppliers. The minimum activities for the Organisation to fulfill this requirement shall be recorded and shall include :
 - a) Effectively communicating the requirements of this standard to senior leadership of suppliers / subcontractors, private employment agencies and subsuppliers,
 - b) Assessing significant risk of non-conformance by suppliers / subcontractors , private employment agencies and subsuppliers.

9.10 Management of Suppliers & Contractors(Contd.)



- c) Making reasonable efforts to ensure that these significant risks are adequately addressed by suppliers / subcontractors , private employment agencies and sub-suppliers and by the Organisation where and when appropriate , and prioritised according to the Organisation's ability and resources to influence these entities.
 - d) establishing monitoring activities and tracking performance of suppliers / subcontractors , private employment agencies and subsuppliers to ensure that these significant risks are effectively addressed.
- **9.10.2** Where the Organisation receives , handles or promotes goods and / or services from suppliers / subcontractors or sub-suppliers who are classified as home workers , the Organisation shall take effective actions to ensure that such home workers are afforded a level of protection substantially equivalent to that afforded to the Organisation's other workers under the requirements of this standard.

