



HS 13

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Labour Standards Policy

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	Health and Safety	HS
	Labour Standards Policy	14

1. Introduction

As a manufacturer of medical devices, Brightwake Ltd (The Company) recognize our obligation to provide our customers with high quality, professional goods and services at a competitive price whilst ensuring that at no point is any person in any part of the supply chain exploited or treated in a way that breaks relevant employment legislation. We are fully aware of the responsibilities we bear to all parties involved in each of the stages involved in producing our products and have such developed this policy to outline the standards that we, and ultimately all stakeholders involved with the business, should seek to adhere to. The Company shall show a preference, where appropriate, to suppliers with higher labour standards.

2. Aims

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standard required of potential future suppliers. The Company's Labour Standards objectives is as follows:

- To become a progressive ethical company and comply with the ETI Base Code.

3. Policy Statement

Brightwake Ltd's policy in relation to labour standards as relevant to the organization itself, contractors, sub-contractors, suppliers and any other parties engaged through the supply chain is as follows:

- We shall comply to all Employment Laws relevant to our business
- We comply to the Health and Safety Act 1974 - as outlined by our Policy
- We comply with all other Employment legislation. We will work as denoted by the ETI Base Code. This demonstrates compliance with the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with international, national and local law and practice.
- We shall encourage all suppliers and contractors to adhere to the Ethical Trading Initiative as part of their respective contracts
- reiterating their commitment to understanding modern slavery risks; and
- ensuring that there is no modern slavery in their own business and supply chains.

	Health and Safety	HS
	Labour Standards Policy	14

3.1 Roles and Responsibilities

Given the size of the company and the number of companies in the supply chain, it is adequate for the Health and Safety Manager to undertake the main responsibility of the LSAS. The Health and Safety Manager shall liaise with the Management representative to develop the LSAS and present any developments at regular intervals to senior management. Target setting for staff involved with the LSAS shall be incorporated into the yearly personnel reviews. Resources relating to the LSAS will be available to all involved staff through the shared drive.

3.2 Labour Standards Status Review

The Company shall commit to undertaking a comprehensive Labour Standards Status Review; when contracting a new supplier and at regular routine visits to suppliers, to ensure that labour standards throughout our supply chain are satisfactory and continually improving. We recognize that if any contractor or sub-contractor is found to be using unethical or illegal labour programs, this would have a profound impact on the reputation and integrity of the company. The timescale of the Labour Standards Status Review is subject to change, given the findings from previous reviews, as deemed appropriate by senior management during the annual Quality Review (QR).

3.3 Legal Requirements

The Company commit to remain up to date with changes to relevant employment legislation through the company HR Manager. Relevant employment legislation with regards to The Company's direct operations is outlined in the Employee Handbook.

3.4 Objectives, Targets and Programmes

The Company commit to developing a Corrective and Preventative Action Plan (CAPA) following each Labour Standards Status Review. The CAPA will be reviewed by senior management during the quarterly management meeting to determine whether the company is on target to reach their objectives and to ensure these objectives are still appropriate. This will ensure that all relevant personnel will be kept up to date with the development of the LSAS programme.

	Health and Safety	HS
	Labour Standards Policy	14

3.5 Competence, Training and Awareness

The Company shall commit to the training of relevant staff in order to be competent with handling the labour standards programme. Relevant staff is those involved in procurement and new product development. Persons involved with the LSAS should:

- Have a good understanding of how The Company operates with knowledge of the supply chain
- Be in a position to contact suppliers and build a relationship with them
- Be trained in the LSAS requirements. Training reviews and development plans for the LSAS will be included as part of The Company's current training system.

3.6 Communications

Training systems, and recorded communication will be used to address LSAS issues. We will use the CAPA system to log and monitor any adverse allegations, complaints or alerts relating to the LSAS.

3.7 Documentation and Records

Documentation and records in relation to the LSAS shall be kept using standard document and record keeping procedures in line with other Quality Documents.

3.8 Operational Control

For the direct operation of the company, Policy documents, the procedures involved with controlling the labour standards of the company and addressing any risks or breaches of this policy that may be posed. The senior management of The Company have identified two critical control points for labour standards in the supply chain; Supplier Approval and Supplier Visits – see section 3.10 for further details

3.10 Supply Chain Management

The Company commit to monitoring and maintaining the labour standards in the company's supply chain through the distribution and communication of the company's labour standards policies along with the ongoing assessment of whether these standards are being met. These standards comply fully with those required by the LSAS. Reviews shall be taken at routine visits to suppliers to ensure they continue to comply fully with the LSAS. The findings of supplier visits shall be noted in the QR.

	Health and Safety	HS
	Labour Standards Policy	14

3.11 Emergency Response

Emergency Response comprises a request for a written Corrective Action Plan within 14 days that is approved by all parties involved. Should this Corrective Action plan be deemed unacceptable then re-sourcing of production from within The Company's existing supplier base shall be implemented within 30 days of the initial breach of the above minimum labour standards.

3.12 Performance Monitoring and Measurement

The Company shall commit to monitoring the performance of the LSAS, assessing the progress of the programme against the latest CAP where appropriate and setting relevant targets, in addition to those stipulated in this policy, to ensure the progression of the LSAS against our objectives. Progression of parties in the supply chain shall be measured against the level of compliance with the ETI Base Code.

3.13 Corrective Action

The current quality system will be used to document improvements from labour standards audits.

3.14 Management Review

Senior management will formally review the labour standards programme during the quarterly management review meeting.

3.15 References

BW 01	Management Review policy
BW 05	Corrective & Preventative Actions (CAPA) Policy
BW17	Supplier Evaluation Policy

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1	4967	06/07/2018	A.Mitcham