



**BRE Global Limited  
Scheme Document**

**SD 235: Issue No. 1.0**

**27 March 2020**

**Ethical Labour Sourcing**



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## Introduction

This verification scheme has been established to provide assurance that organisations have made a measurable commitment to manage ethical labour sourcing challenges in their company and supply chains. This scheme will encourage better ethical labour sourcing practices through an evaluation of a set of maturity levels by complying with BRE Global's Ethical Labour Sourcing Standard (ELS), BES 6002. This scheme will provide confidence that labour services are being ethically sourced. There is one pathway to verification under this scheme which is outlined in Section 5 of this document.

## 1 Scope

This scheme provides ongoing independent, third party assessment and verification of organisations within the construction value chain demonstrating that they have met the baseline requirements for the ELS.

## 2 Applications for Verification

To apply for verification, the applicant should complete application form BF1715 and return it to BRE Global. The application will be reviewed and if accepted, a proposal will be prepared setting out:

- Company to which the verification will be assigned
- Services/locations included within the scope of verification
- Scope of the verification activities
- Additional requirements for approval
- Additional information supporting aspects of Human Rights Due Diligence
- Maintenance of verification
- Travel and subsistence
- Formal quotation

All proposals and contracts are subject to BRE's Terms and Conditions for certification, verification, listing, conformity assessment, and CE marking as detailed in TC201B. If the applicant wishes to continue the verification process upon receipt of the proposal they should return the completed declaration to BRE Global.

*For more information or help with your application contact BRE Global on +44 (0) 333 321 88 11 or e-mail [ELS@bregroup.com](mailto:ELS@bregroup.com).*

## 3 Assessment Process

In order to achieve verification applicants are required to:

- Submit an application form (BF1715)
- Outline the scope of verification that they require
- Comply with all of the baseline elements of the ELS

### 3.1 Assessment Structure

The assessment structure is made up of the following steps:

1. Client contracts with BRE Global for the verification to the ELS following a successful application. Application for verification can follow Step 2 and 3, i.e. once Client self-assessment has been completed
2. Client creates an account in the ELS online tool <https://www.elsonline.co.uk/login.jsp>

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3. Client completes ELS self-assessment and submits via the ELS online tool. As a minimum, the organisation should comply with all of the baseline criteria of the ELS Standard
4. Client's online submission is locked and BRE Global reviews the ELS self-assessment and identifies areas for specific development
5. BRE Global and Client agree the scope of, and arrange site visit to discuss specific aspects with senior staff at the Client organisation
6. BRE Global conduct site visit and agree an action plan of a minimum of five specific objectives for improvement and review intervals. Review intervals will almost certainly not be annual as emphasis is on continuous improvement. Ongoing dialogue between BRE Global and the Client will be encouraged
7. Assessment report is completed and is independently reviewed to ensure that the evidence submitted satisfies the requirements of the levels awarded
8. BRE Global makes the verification decision and if Scheme Requirements are met issues a Statement of Verification
9. Statement of Verification is hosted on GreenBookLive
10. Client improves performance in agreed areas over the next 11 months
11. Process starts again to maintain verification

During the verification process BRE Global may pause the verification if additional evidence comes to light which conflicts with the principles of the standard. In such a situation the organisation under assessment will need to provide specific evidence that the matter has been proactively investigated, root causes identified and appropriate action taken.

The site visit is not planned to be seen as a pass or fail type of system. The visit itself will determine the requirements based upon a tiered certification approach which becomes a long term aspiration for companies to learn and grow from the experience over time and also to delve deeper into the company's operations as it uncovers more knowledge through the process.

The concept is to create a bespoke plan for each company. The plan will be dependent upon a number of factors:

- What services the organisation provides and/or procures as part of its core trade classification
- Which geographical boundaries the organisation operates in, and which disciplines and/or departments will be the subject of further investigations
- What policies and procedures are in place; and what management systems and risk management approach the organisation has to address risks related to ethical labour sourcing
- What procurement and supply chain management processes are in place; and what due diligence the organisation performs to ensure itself that its supply chain acts legally wherever they are located
- What level of maturity within each section of the Standard the organisation looking to achieve
- What actions the organisation will put in place to address any findings from the site visit

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#### 4 Verification Requirements

In order to ensure that organisations meet, and continue to meet, the requirements of this scheme document, applicants are required to answer a series of questions across 12 issues:

Organizational Structure	Management Policies
Management Systems	Assurance, Compliance and Auditing
Human Resources	Immigration
Procurement	Supply Chain Management
Bribery & Corruption	Learning & Development
Forums	Reporting

Organisations must as a minimum:

- Have documented evidence in relation to its business operations for effective governance in relation to ethical labour sourcing.
- Have organisational policies in relation to safety, health, modern slavery, responsible sourcing; ethics, fraud and malpractice; anti-bribery and corruption; and human resources.
- Have documented evidence that its management systems are adequate address modern slavery risks; and have evidence to demonstrate legal compliance with respect to recruitment.
- Have a mechanism by which it would be alerted, in a timely manner, to legal non-compliances in its recruitment and workforce management processes.
- Have evidence that there is a senior level commitment and accountability to ensure compliance with human resources legislation; and that all workers are treated equally in the workplace regardless of their national origin, ethnicity, race, religion, social cast or sex.
- Have basic processes and procedures to ensure that all personnel recruited are eligible to work in the UK.
- Have supplier agreements/codes of conduct to cover its procurement activities which reference ethical issues.
- Demonstrate how it has considered the legal requirements of workers' rights and/or ethical labour criteria as part of its supply chain management.
- Demonstrate compliance with the Bribery Act 2010.
- Demonstrate that it provides basic training to key groups of staff in general legal requirements relating to corporate responsibility and ethics.
- Demonstrate that it operates internal forums or committees relevant to business ethics and sustainability issues.
- Provide a statement or report in accordance with the Modern Slavery Act 2015 reporting requirements if meeting the turnover threshold to report under the Act.

#### 5 Verification and Listing

Verification is awarded to companies when all assessment activities have been satisfactorily completed, the Independent Reviewer has confirmed the BRE Global Assessor's technical

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evaluation and has made the verification decision based on the assessment report. Statements of Verification will detail the company name or company name and parts of the organisation that have been verified. The ELS Statement of Verification is valid for a period of 12 months. Details of the verified organisation will also be listed on [www.greenbooklive.com](http://www.greenbooklive.com).

To ensure continuous verification, the re-verification process must be completed prior to the Statement of Verification expiry date. It is not the policy of BRE Global to extend verification validity beyond the expiry date and the existing Statement of Verification will be withdrawn, regardless of whether re-verification is being undertaken. Any deviation from this will be dealt with on a case by case basis.

## 6 Demonstration of Continuous Improvement

The scope of the initial verification is a full profile of the organisation under assessment. In the following year, organisations under assessment must demonstrate how the five (minimum) agreed objectives set at the point of verification have been closed out or revised in advance of the anniversary of the verification. Evidence of ongoing progress against the objectives can be submitted to BRE Global via email or the ELS online tool.

Changes to maturity levels achieved is through an organisation having closed out their agreed objectives, or through the provision of evidence demonstrating how the organisation has fulfilled the additional criteria requirements. Achieving objectives may not necessarily enable an organisation to move up the maturity pathway. Evidence of updates to policies and practices will also be documented for verification across all 12 issues.

## 7 Updates to BES 6002

The BES 6002 Standard and verification scheme will be updated from time to time to take account of evolving ethical labour sourcing principles and practices. Upon application, the most recent version of BES 6002 published at the point of the initial assessment will be used.

## 8 Verification Mark

Once the Statement of Verification has been issued, the BRE Global Verification Mark can be used as directed in the publication PN321 – General Rules and Guidance for the use of the BRE Global Verification Marks.

The Verification Mark shall only be used in accordance with the BRE Global's instructions.

## 9 Complaints and Appeals

BRE Global operates procedures for complaints and appeals. Further details can be found in Document XP107E, which can be made available on request or viewed from our web-site [www.GreenbookLive.com](http://www.GreenbookLive.com) ([XP107E](#)).

## 10 Publications referred to

BF1715	Application for Ethical Labour Sourcing Scheme Verification
TC201B	Terms and Conditions for certification, verification, listing, conformity assessment, and CE marking
PN 321	General Rules and Guidance for the use of the BRE Global Verification Marks
XP107E	Complaints and Appeals

For undated references please refer to the most recent dated issue.

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