

Ethical sourcing

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1 Introduction

- 1.1 All workers in our supply chains in the UK and throughout the world should be treated equitably and with dignity. To do so, we commit to adopting responsible and ethical business practices, and to promoting and upholding similar standards with our suppliers and throughout our supply chains.
- 1.2 Ethical sourcing aims to align purchasing decisions with respect for basic working conditions along the supply chain. This policy sets out the minimum standards which the Commissioner expects its suppliers to observe and the procedures to assess and mitigate risks. This builds upon existing requirements used in contracts for workwear and IT/electronics, by setting procedures to cover high-risk sectors. It also implements the requirements of the Modern Slavery Act 2015 as well as the requirements laid out in the Procurement Act 2023, enacted by the 2024 Procurement Regulations.
- 1.3 Like any large organisation, the London Fire Commissioner (LFC) has supply chains which stretch across the globe. These encompass countries where safe and ethical working practices are often lacking, such as Bangladesh for workwear, where a substantial loss of life occurred with the collapse of the Rana Plaza factory in 2013. Workers are often subjected to health and safety risks and the use of forced and child labour is also not uncommon in many sectors and regions, such as the treatment of Uyghur Muslims in the Chinese cotton industry. Not all suppliers in these regions will have poor practices, but the risk remains. LFC takes its responsibilities as a purchaser seriously and acts to ensure that its suppliers meet rigorous ethical standards, in particular in high-risk sectors such as clothing production and electronics.
- 1.4 This document sets out the actions which the LFC will take to ensure transparency in its supply chain and that ethical sourcing standards are met by its suppliers and their sub-contractors. This includes meeting new and established legal standards under the 2023 Procurement Regulations, 2015 Modern Slavery Act and International Labour Organisation conventions.
- 1.5 Increased supply chain transparency and standards also provide added benefits of improved quality control, which is essential for a number of the high risk groups covered such as PPE. The policy focuses in particular upon those sectors which have been identified as posing the highest risk of poor working conditions. It sets out procedures to be followed both during the tender process and contract delivery.
- 1.6 These steps, while requiring some additional work on behalf of the LFC and its suppliers, will help to safeguard our supply chains and to avoid financial and reputational risks. The guidelines make use of recognised third-party certification and risk assessment tools which are already used by LFB and its suppliers. It sets a standard approach which can be adapted to individual contracts based on their sector, value and the nature of supplier relationships. It also contains a commitment to continually review our approach to ensure that new issues can be addressed in cooperation with our suppliers.

2 References

- 2.1 The London Fire Commissioner's Procurement Standing Orders (incorporating The Procurement Act 2023).
- 2.2 Policy number 0696 – The GLA Group responsible procurement and social value policy.
- 2.3 Sustainability checklist for LFC (or successor body) contracts.
- 2.4 GLA Group Sustainable Food Commitments.
- 2.5 GLA Sustainable Timber Policy.

- 2.6 *Ethical Trading Initiative Base Code*
- 2.7 International Labour Organisation Conventions

3 Definition and purpose

- 3.1 The workforce of our supply chain should be able to expect the same basic standards that we expect: to work in safe conditions, to be treated with respect and without discrimination, and to earn a fair wage. Ethical sourcing is defined as:

Ensuring that goods and services are procured with due regard to the risks to human welfare arising in the supply chain and minimising these risks by working with suppliers to identify, address and monitor them.
- 3.2 We consider ethical sourcing in relation to labour standards, health and safety, environmental practices and business ethics. Ensuring these issues are addressed both at the procurement stage and in the delivery of contracts will reduce reputational, legal and financial risks to the Commissioner and encourage our suppliers to offer full visibility of their supply chains.
- 3.3 Implementing ethical trading practices is also associated with higher quality of outputs and increased productivity.¹ As a customer London Fire Brigade can expect to benefit from improved performance and quality as well as less risk of disruption to supply chains.

4 Scope

- 4.1 The core commitments apply in respect of all contracts awarded by or on behalf of the Commissioner. Staff working with LFB Enterprises are advised to take these commitments into account when conducting business on its behalf, in particular by applying the risk assessment process.
- 4.2 The Procedure for Contracts applies to all contracts with an estimated value above the UK procurement thresholds, as amended from time to time.
- 4.3 The requirements regarding product certification apply in respect of key contracts in high and medium risk sectors. The risk assessment process applies in respect of high risk sectors only.
- 4.4 For the purposes of this policy, key contracts are defined as those where LFC:
 - (i) Has longer-term relationships with suppliers (contract duration greater than two years or subject to repeated renewals); or
 - (ii) requires bespoke products; or
 - (iii) has significant levels of spend, typically $\geq$ £500,000 on high or medium risk products.

This definition is intended to capture those contracts in respect of which LFC has greater capacity to influence ethical sourcing practices and to monitor progress over time, or where our requirement for bespoke products can increase the risk of poor practice.

- 4.5 For the purposes of the policy, high risk sectors are defined as:
 - (i) Electronics

¹The effect of fair trade on quality and productivity (as well as other factors such as incomes, educational and health outcomes) has been the subject of numerous studies. One review of these in 2011 found positive effects on quality in 96% of studies, with no effect in 4% of studies. Productivity increases were found in 55% of studies, with no effect in 36% and negative effects in 9% of studies. (Vagneron and Roquigny, 2011 "What do we really know about the effects of fair trade?" Paris: PFCE).

- (ii) Electric vehicles
- (iii) Products containing Lithium-ion batteries
- (iv) Textiles (clothing and PPE, footwear, bags, carpets, upholstered furniture).
- (v) Construction sites and materials (natural stone, brick, concrete).

and medium risk sectors are defined as:

- (vi) Facilities management (including cleaning, catering and security services).
- (vii) Food and drink (especially tea and coffee, sugar, fish and poultry, cocoa, palm oil).
- (viii) Cleaning products and chemicals.
- (ix) Timber products (furniture, flooring and construction).

The designation of high and medium risk sectors will be reviewed in accordance with paragraph 7.3.

5 Core commitments

- 5.1 LFC will regularly review contracts to identify new areas of potential risk related to ethical sourcing and work with the relevant suppliers to increase the transparency of supply chains. We recognise that working with suppliers to address ethical issues can deliver better outcomes for the workforce in question than taking our business elsewhere. We will proactively engage with suppliers to encourage good practice and to support improvements that manage and address issues of non-compliance, and we will take more stringent actions where suppliers are not prepared to address non-compliance.
- 5.2 LFC will apply the Procedure for Contracts in respect of all contracts valued above the Official UK Procurement thresholds, as set out in the 2023 Procurement Act. This aims to identify any ethical issues which may arise in the supply chain and to take appropriate measures to mitigate risks.
- 5.3 For key contracts in high and medium risk sectors, LFC will seek to purchase products with relevant third-party certifications addressing ethical issues within the supply chain. Examples of relevant product certifications for each relevant sector are given in Appendix 4.
- 5.4 LFB is also a member of Electronics Watch, an independent monitoring organisation that assists public sector buyers to meet their responsibility to protect the human rights of electronics workers in their global supply. For contracts containing in-scope products, Electronics Watch contractual clauses will be included as part of the terms and conditions for a supplier. They require our suppliers to comply with the Electronics Watch Code of labour standards (or similar) and exercise due diligence by identifying and mitigating risk of breaches and remedying actual breaches and preventing their reoccurrence.
- 5.5 LFB will proactively produce reports to Electronics Watch annually of all in-scope products purchased and share relevant contract details to enable increased supply chain transparency and monitoring. We will work with Electronics watch and relevant suppliers to action reports of violations and facilitate remedial action where possible. We will also ask suppliers, where relevant to disclose tier 2 data in order to more accurately map our wider supply chains. This will also contribute to LFC's policy on Business continuity in the supply chain.
- 5.6 Where third-party product certification is unavailable, unsuitable or does not fully address ethical supply concerns, suppliers **must** disclose the production sites to be used for a contract **and** demonstrate compliance with the Ethical Trade Initiative's (ETI) base code, incorporating the core

International Labour Organisation conventions. They are also expected to demonstrate that their subcontractors comply with these requirements.

- 5.7 In addition, for key contracts in high and medium risk sectors suppliers will be asked to complete the government Modern Slavery Assessment Tool (MSAT). The scores achieved in the assessment may form part of the assessment of key performance indicators under the contract, as appropriate. Scores may also inform further engagement and training with suppliers to help them to improve their scores and better their governance and risk management of Modern Slavery supply chain risks.
- 5.8 For key contracts in high and medium risk sectors, suppliers may be asked to supply information about supply chains on the Open Supply Hub in order to increase transparency of risk if products fall outside of scope for Electronics Watch monitoring. This will also contribute to the LFC's policy on Business continuity in the supply chain and risk mapping.
- 5.9 From 2026 onwards the LFC will commence reporting on additional responsible procurement and social value metrics, as set out in Policy number 0696 - GLA Group Responsible Procurement and Social Value Policy (2025-2028).
- 5.10 In 2026 LFB published its new 2026-2030 Sustainable Development Strategy with 9 key objectives. Of these, two are designed to help underpin the delivery of ethical sourcing. They are to:
- (a) Develop a diverse and inclusive workforce, supported by a diverse and inclusive supply chain.
 - (b) Promote ethical sourcing and address risks of human and labour rights abuses in our supply chain.

In order to help achieve the above objectives, the LFC will report on the following metrics relevant to ethical sourcing. Suppliers are expected to engage with requests for data and transparency in order to support this reporting.

- Number of suppliers providing factory disclosures as per Electronics Watch Contract Conditions.
- Number of key suppliers with Trade Union Recognition agreement and collective bargaining agreement.
- Percentage of eligible key suppliers that have achieved 70% in the Modern Slavery Assessment Tool (MSAT).

6 Procedure for contracts

- 6.1 Application of the 2024 Procurement Regulations (under the 2023 Procurement Act), including the mandatory and discretionary grounds for exclusion, allows the LFC to take into account compliance with applicable social, environmental and labour laws on the part of suppliers and their subcontractors.² If a supplier has been convicted of offences relating to people trafficking or child labour, it is mandatory to exclude them from the tender process. If a supplier has not complied with applicable legislation such as minimum wages or health and safety laws in any country where it operates, it may also be excluded. Bidders can be asked about the supply chain management measures which they will put in place for the delivery of a contract, which may include third-party audits if appropriate.
- 6.2 For all contracts with companies or other organisations with turnover in excess of £36m, to whom the requirements of Part 6 of the Modern Slavery Act apply (Appendix 1), the organisation's

² As established in The Procurement Act 2023's Schedule 6, paragraph 10 and Schedule 7, paragraph 4.

Slavery and Human Trafficking Statement must be reviewed as part of the tender process to ensure that any risks are suitably addressed. This statement must be kept up to date for the duration of the contract and reviewed annually. The Procurement Act 2023 provides for mandatory exclusion of bidders who have been convicted of an offence under the Modern Slavery Act.³

6.3 As a guide, it is expected that company statements on slavery should include the following type of information to demonstrate that risks assessed, recognised where relevant, and actions are being taken to address those risks:

- (i) Identify which aspects of their supply chain they consider are at risk of slavery.
- (ii) What actions they are taking to increase transparency in the areas at risk.
- (iii) How they address slavery through supplier selection and flow down of requirements through the supply chain.
- (iv) The level of leadership involvement in addressing the risk.
- (v) Any use of third party certification standards, third party audits or membership of industry organisations trying to tackle worker conditions in relation to areas of identified risk.

Such information on policies and risk assessments of products within the contract may be asked for at tender stage and responses would be evaluated and scored. Where such information is lacking or incomplete, clarifications should be sought.

6.4 For key contracts in high risk and medium risk sectors, suppliers should be asked to provide products bearing the relevant third-party certification standards set out in Appendix 4, or equivalent third-party certifications. Certification must be specific to the product or site of production and a requirement to maintain up-to-date certification must be included in the contract.

6.5 Where use of these certification standards is considered unsuitable, suppliers are unable to offer certified products or the standards are not considered to fully address LFC's ethical concerns, suppliers should be asked to:

- (i) Disclose the proposed sites of production for the contract and all subcontractors; and
- (ii) provide evidence to demonstrate they and their subcontractors meet the ETI base code.

6.6 For high risk contracts, depending upon value, suppliers may be asked additional social value questions including but not limited to the completion of risk assessment Matrices regarding Modern Slavery and Ethical Sourcing Practises. These requirements will be published as part of the ITT and responses will be evaluated, scored and moderated against LFBs Ethical Sourcing commitments.

7 Responsibilities

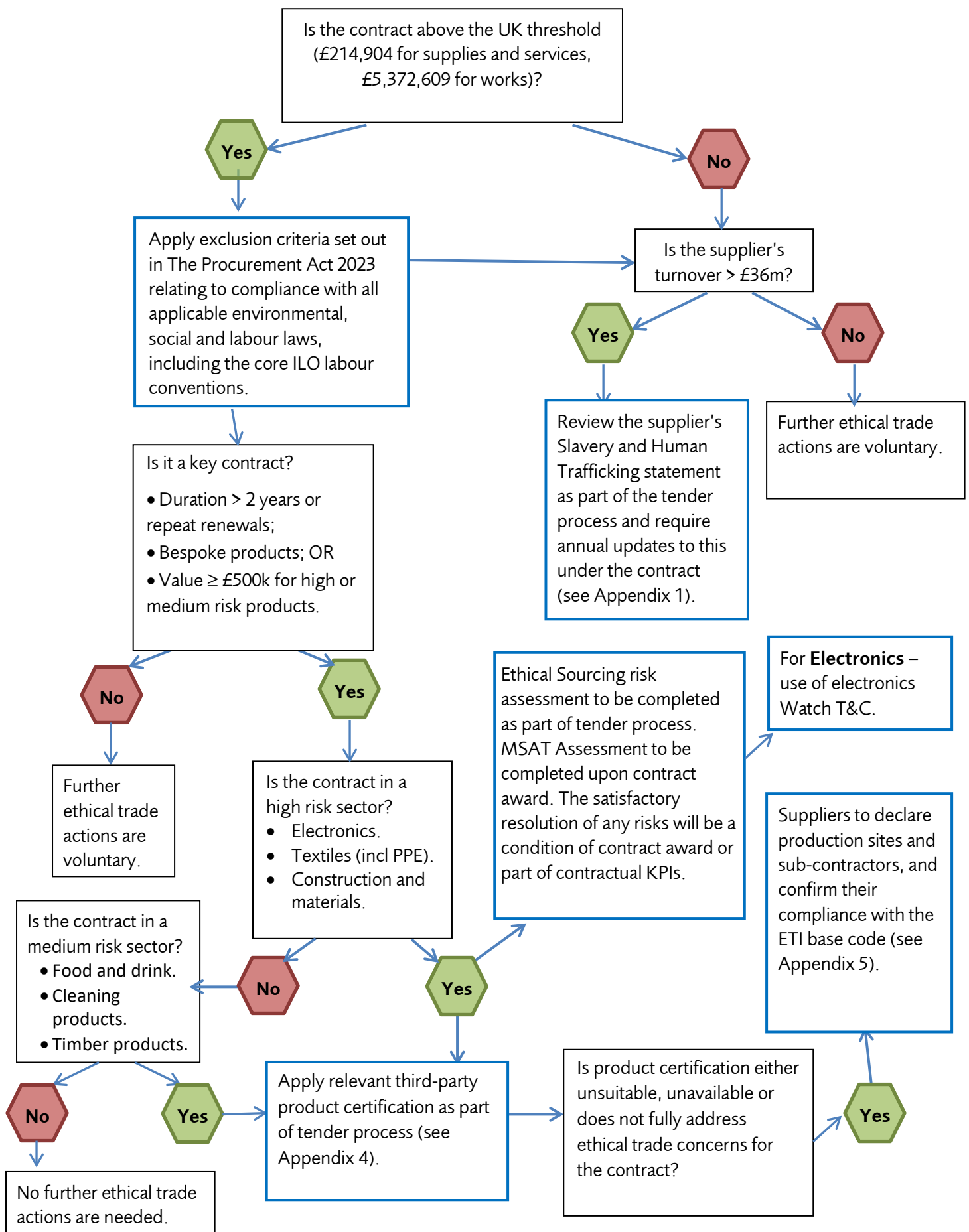
7.1 The Assistant Director of Procurement and Commercial is responsible for ensuring the policy is applied to all applicable tenders.

7.2 The Head of Sustainable Development is responsible for ensuring that the policy is kept up to date.

³ Schedule 6, paragraph 41 in The Procurement Act 2023, inserted by the Modern Slavery Act (Consequential Amendments) 2015.

- 7.3 The Head of Sustainable Development is responsible for reviewing the list of high and medium risk sectors set out in Appendix 1 against the LFC Contracts Register and the sources of information cited in Appendix 1, to determine whether any sectors/products should be added or removed. This list will be reviewed at least annually.

Flow diagram – Ethical sourcing requirements



Appendix 1 – High and medium risk sectors

Sector/product	Typical production countries/regions	Specific risks
Electronics	Southeast Asia, United States, Latin America and Europe, with components sourced globally	Low pay; excessive working hours; use of conflict minerals; child and forced labour, debt bondage.
Electric vehicle batteries	Cobalt – Democratic Republic of Congo (DRC); Lithium - Australia, Chile, China; Nickel – Canada, Indonesia, Philippines and Copper – Chile	Use of conflict minerals; child and forced labour; low pay, unsafe working conditions; excessive working hours.
Textiles (clothing, footwear, bags, carpets, upholstered furniture), PPE	India, Bangladesh, Eastern Europe, Malaysia, Middle East	Low pay; excessive working hours; health risks to workers (e.g. exposure to adhesives, fire hazards); child and forced labour, debt bondage.
Construction materials (natural stone, brick, concrete, metals)	China, India, Turkey, Iran, Italy	Unsafe working practices; low pay; environmental risks.
Construction sites	UK	Multi-tiered supply chains, agency labour - can result in poor labour practices. Unethical practices including unlawful or excessive recruitment fees, unfair/incorrect terms of employment, withholding of passports, etc.
Facilities management: cleaning, catering and security services	UK	Low skilled labour; migrant labour; agency labour.
Food and drink (especially tea and coffee, fish and poultry, cocoa, palm oil)	UK, Ireland, continental Europe, Africa, Asia, Middle East, Latin America	Low wages; bonded labour; slave labour in fishing; unsustainable production methods; health risks to workers (e.g. pesticide exposure); health risks to consumers (food safety); animal welfare.
Cleaning products and chemicals	Europe	Environmental risks in production; health and safety in production and for users; animal testing.
Timber products (furniture, flooring, construction)	Southeast Asia, Africa, Latin America, Eastern Europe	Illegal/unsustainable forestry; unsafe working practices.

Legend: - High risk sector - Medium risk sector

Sources of information:

- EBRD Environmental and Social Risk Categorisation 2014 www.ebrd.org.
- Sedex Risk Assessment website www.sedexglobal.com.
- Ethical Trading Initiative website www.ethicaltrade.org.
- Norwegian Agency for Public Management and eGovernment (DIFI), List of High Risk Goods <http://www.anskaffelser.no/sosialt-ansvar/information-english/high-risk-products>.
- U.S. General Services Administration and U.S. Department of Energy, Verification Guide for Federal Purchasers of Sustainable Products.
- Electronics Watch <https://electronicswatch.org/en>.

Appendix 2 – Modern Slavery Act requirements

- 1 The UK Modern Slavery Act (S.I. 30 of 2015) came into effect in July 2015. It consolidates slavery and human trafficking offences, and introduces new preventive measures, support systems and an independent monitoring body (the Anti-Slavery Commissioner).
- 2 The Act includes new measures including trafficking reparation orders and prevention orders to ensure that those who pose a risk of committing modern slavery or trafficking offences cannot work in relevant fields, such as with children or vulnerable people. Local authorities are also under a duty to report suspected incidents of slavery and trafficking to the Secretary of State.
- 3 The Transparency in Supply Chains Clause (Part 6), requires **any company with a turnover of more than £36 million⁴** that 'supplies goods and services' and 'carries on a business, or part of a business, in any part of the UK' to **publish an annual slavery and human trafficking statement**. This applies regardless of the size of the company's UK operations and must cover its **global supply chain**.
- 4 In this statement, the company needs to publicly disclose the steps, if any, taken to ensure slavery and human trafficking are not taking place in any of its supply chains or in any part of its own business.
- 5 An organisation's slavery and human trafficking statement may include information about—
 - (a) The organisation's structure, its business and its supply chains;
 - (b) its policies in relation to slavery and human trafficking;
 - (c) its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
 - (d) the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
 - (e) its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
 - (f) the training about slavery and human trafficking available to its staff.

If the organisation has a website, it must:

 - (a) Publish the slavery and human trafficking statement on that website; and
 - (b) include a link to the slavery and human trafficking statement in a prominent place on that website's homepage.
- 6 If the organisation does not have a website, it must **provide a copy of the slavery and human trafficking statement to anyone who makes a written request for one**, and must do so before the end of the period of 30 days beginning with the day on which the request is received.
- 7 Annual statements must be approved by the board and signed by a director or equivalent. Under the Companies Act 2006, directors can be held criminally liable for signing off on wrongful or misleading information in their annual reports.

⁴ The relevant level of turnover is set by regulations, with £36m being the value set as of October 2015. This is measured on a worldwide basis, including the turnover of any subsidiaries (including those operating wholly outside of the UK).

Appendix 3 – Use of third-party certifications in tenders

- 1 The below third-party certifications wholly or partially address LFB's ethical sourcing requirements for each of the listed product categories. Equivalent labels must always be accepted.
- 2 Where these products are provided under service contracts, the service provider should be asked about their ability to comply with these or equivalent certifications. If appropriate, provision of certified products may either be included as part of the specification or assessed under the award criteria (i.e. bidders will receive more marks if they offer to provide certified products).

Product type	Relevant certification(s) and issues covered	Label image	Policy compliance (5.4)
Electronics	TCO Certified Socially responsible manufacturing; design for recycling; energy efficiency; non-toxic plastics; heavy metals and halogens; visual ergonomics; health and safety		Partial – include declaration of ETI compliance in tender/ contract and Sedex SAQ
Textiles	SA 8000 Social Accountability† Working conditions including child labour; forced labour; collective bargaining; health and safety; discrimination; working hours; remuneration. Fairtrade mark (for cotton) Traceability; environmental and labour standards in production; price premium to support development.	  http://www.sai-intl.org/data/n_0001/resources/live/2008StdEnglishFinal.pdf	Where it applies to specific manufacturing site(s) for the contract Yes (cotton only)
Cleaning products	Certified Cruelty Free No animal testing; audit compliance EU Ecolabel Reduction of environmental and health risks linked to chemicals and packaging	 	Yes if both are required
Tea, coffee, sugar, cocoa products and bananas	Fairtrade mark Traceability; environmental and labour standards in production; price premium to support development.		Yes
Seafood and farmed fish	Marine Stewardship Council/Aquaculture Stewardship Council Traceability; legal and sustainable fishery; exclusion of forced labour.	 	Yes

Product type	Relevant certification(s) and issues covered	Label image	Policy compliance (5.4)
Timber and paper products	Forest Stewardship Council (FSC)/Programme for the Endorsement of Forest Certification (PEFC) Traceability (chain of custody); legal and sustainable timber; emissions and pollutants	 The image shows two logos side-by-side. On the left is the FSC logo, which consists of a stylized tree with a checkmark inside a circle, and the letters 'FSC' below it. On the right is the PEFC logo, which consists of a stylized tree with a circular arrow around it, and the letters 'PEFC' below it. Below the PEFC logo is the text 'PEFC/16-01-01'.	Yes
Construction products	BES 6001 Framework Standard Organisational management; Supply chain management; Environmental and social issues. Product search via www.greenbooklive.com	 The image shows a blue rectangular logo with the text 'BES 6001' in large white letters. Below it, in smaller white letters, is 'Responsible Sourcing'. At the bottom, in even smaller white letters, is the website 'www.greenbooklive.com'.	Yes

Appendix 4 – ETI base code

Please check www.ethicaltrade.org for version current at time of tender/

contract. 1 **Employment is freely chosen**

- 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.

Guidance and resources

2 Freedom of association and the right to collective bargaining are respected

- 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.

Guidance and resources

3 Working conditions are safe and hygienic

- 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 and 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 and safety to a senior management representative.

Guidance and resources

4 Child labour shall not be used

- 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, defined as being under 15 years of age.
- 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. Guidance and resources

5 Living wages are paid

- 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.

Guidance and resources

6 Working hours are not excessive

Note: This base code clause was revised with effect from 01 April 2014. Find out more.

- 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.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

Guidance and resources

7 No discrimination is practised

- 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.

Guidance and resources

8 Regular employment is provided

- 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.

Guidance and resources

9 No harsh or inhumane treatment is allowed

- 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.

Guidance and resources

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 law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Document history

Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	31/08/21	SDIA	H - 14/09/21	HSWIA	21/09/21	RA	N/A
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Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
1.1, 1.3, 2.1, 2.2, 4.2, 5.2, 5.7, 6.1, 6.2, Diagram	Updating references to the new Procurement Act (2023) and 2024 Procurement Regulations as well as reflecting commitments in the new GLA Responsible procurement Policy and Implementation Plan (2025).	08/08/2025
Throughout	Reviewed as current – no changes	01/04/2026
1.1, 1.4, 2.2, 2.6, 2.7, 4.5, 5.4, 5.5, 5.6, 5.7, 5.8, 5.9, 5.10, 6.3, 6.6, 7.1, Flow Diagram, Appendix 1	Updated with reference to new 2026-2030 Sustainable Development Policy as well as reflecting new procurement practises and advice from GLA Central RP team.	08/06/2026

Subject list

You can find this policy under the following subjects.

Ethnical sourcing	Modern slavery
Responsible procurement	Sustainability

Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

Considered by: (responsible work team)	FOIA exemption	Security marking classification