



CLEANING
ACCOUNTABILITY
FRAMEWORK

Guide to the CAF Building Certification Scheme

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Definitions

Auditor refers to the registered, independent auditor authorised by CAF to undertake audits;

Building Manager refers to the entity or individual managing a building, including facility management companies;

CAF refers to the Cleaning Accountability Framework Inc. as the organisation managing Certification;

CAF Steering Committee refers to the governing body of CAF;

Cleaning Contractor refers to the incumbent primary cleaning contractor at a building, and can at times also refer to the outgoing/incoming cleaning contractor where there is a change in contract;

Property Owner refers to the entity holding ownership of a building;

Standard refers to the CAF 3 Star Standard (set of 6 Standards) or to the applicable Standard (one of 6).

Background

The Cleaning Accountability Framework (CAF) is an independent multi-stakeholder organisation comprised of representatives from the property and cleaning services industry supply chain.

CAF's objective is to identify and recognise best practice tendering and compliance approaches in the cleaning industry that support quality-focused cleaning services, fair wages and decent labour standards.

CAF acknowledges that all participants (cleaning contractors, tenants, building managers, property owners and investors, and cleaners and their representatives) in cleaning supply chains have an active role to play in lifting standards in the cleaning industry.

CAF promotes:

- the rights of cleaners;
- transparent and accountable cleaning supply chains;
- sustainable business models; and
- responsible contracting practices.

We do this through the CAF Certification Scheme, which recognises and rewards best practice in the cleaning industry.

The CAF Certification Scheme is comprised of two elements:

- 1) building certification; and
- 2) contractor pre-certification.

This guide focuses on the CAF building certification scheme. For more information about CAF, please visit our website: www.cleaningaccountability.org.au

Benefits of Building Certification

The CAF Certification Scheme is truly a win-win situation for all stakeholders. By designing and rolling out a credible building certification scheme focused on the labour conditions of cleaners and improved procurement processes, CAF will deliver a number of benefits to all stakeholders.

For property owners and investors, CAF certification:

- ensures that entities in their supply chain aren't inadvertently supporting unlawful labour practices;
- minimises time spent assessing tenders and managing contracts;
- drives the delivery of cleaning services that attract and retain tenants; and
- reduces the risk of being involved in a contravention of workplace laws through accessorial liability provisions under section 550 of the Fair Work Act.

For cleaners, CAF:

- helps drive compliance with labour standards in their workplace; and
- gives them a voice in the maintenance of quality cleaning and decent work.

For cleaning contractors, CAF:

- contributes to a sustainable future for the cleaning industry by balancing price and performance instead of rewarding 'rock-bottom' pricing; and
- recognises those participants that are adopting better and best practices within the cleaning industry.

For building managers, CAF:

- provides tools to deliver and maintain competitive and compliant cleaning contracts to property owners;
- ensures that entities are not inadvertently supporting unlawful labour practices; and
- reduces the risk of being involved in a contravention of workplace laws through accessorial liability provisions under section 550 of the Fair Work Act.

For tenants, CAF:

- provides quality cleaning by experienced cleaners who are respected and safe at work and are receiving their minimum legal pay and entitlements;
- minimises the risk of potential reputational damage for significant tenants where exploitation of cleaners is uncovered; and
- demonstrates ethical sourcing strategies and company due diligence over indirect supply chains.

CAF Core Principles

CAF sets out the following principles of best-practice for stakeholders involved in the cleaning services and property industries. Participants in the CAF certification scheme are expected to uphold these core principles at buildings undergoing certification and across their own business operations.

- 1) All stakeholders who participate in the industry are treated decently and with respect, and the workplace is free from violence, harassment and bullying;
- 2) The workplace is free from discrimination, with equal opportunity for everyone regardless of race, nationality, ethnic origin, gender, age, sexual orientation, marital status, disability, industrial activity, union membership or religion;
- 3) Freedom of association and the right to actively participate in and be represented by a union (including through collective bargaining) are respected and pro-actively supported by all stakeholders, and workers are protected from anti-union discrimination and interference;
- 4) Grievance procedures through which issues can genuinely be raised are accessible and communicated to employees;
- 5) Stakeholders work cooperatively to continuously achieve best practice work environments, work design (including sufficient materials and properly maintained equipment), supervision and training to enable cleaners to perform their jobs safely and efficiently and to ensure high levels of work health and safety outcomes;
- 6) Employee workloads are reasonable and can be performed safely, and employee performance indicators are reasonable, measurable and communicated;
- 7) Stakeholders with control over the employment of cleaners ensure that cleaners benefit from security of employment by being able to continue working at a building with another employer when there is a change of contract;
- 8) Stakeholders who provide wages and working conditions to employees that are over and above minimum standards are recognised as best practice;
- 9) Subcontracting, if carried out, is done so in compliance with contract conditions and the employment conditions provided to subcontracted staff are no less favourable than those provided to directly employed staff under the conditions set out in the principal contract;
- 10) The contract price paid is sufficient to enable contractors to meet all of their obligations, including providing wages, superannuation and all other entitlements in line with the specified industrial instrument and relevant legislation; and
- 11) Recognition is made of stakeholders who are committed to sustainability, including the development, implementation and continual improvement of sustainable practices within cleaning services contracts.

CAF 3 Star Standard

The CAF 3 Star Standard is at the heart of the building certification scheme.

Under the CAF certification scheme, a property owner, building manager or tenant can nominate a building for review by CAF. The review process involves engagement of an independent auditor appointed by CAF to assess the building against the CAF 3 Star Standard. It also involves a social audit, whereby cleaners and their union, United Voice, are engaged at each site to provide verification that the Standards are being met.



CLEANING ACCOUNTABILITY FRAMEWORK

Standard		Purpose
1. Labour	1A) Labour – Wages and Conditions	This Standard assesses compliance with the Fair Work Act and any applicable industrial award or enterprise bargaining agreement; and all record-keeping and pay slip obligations. It also assesses compliance with tax and superannuation obligations relating to the employment of cleaners.
	1B) Labour – Job Security	<p>This Standard aims to promote job security for cleaners and reduce labour turnover at change of contract. It seeks to ensure that cleaners do not lose their job as a result of a change of contract.</p> <p>This involves:</p> <ol style="list-style-type: none"> 1. Notifying cleaners as soon as practicable that a contract has been terminated or is due to expire. 2. Offering all cleaners continued employment at the building (by the Incoming Contractor). 3. Where cleaners do not choose to continue working at the building, offering similar/equivalent work at another building or providing mandatory payment of redundancy to those employees who do not accept the offer of redeployment (by the Outgoing Contractor).
	1C) Labour – Right to Work in Australia	This Standard provides verification that workers have the right to work in Australia and are working in compliance with their visa conditions where applicable.
2. Responsible Contracting	2A) Responsible Contracting – Pricing	<p>This Standard aims to promote transparency and ethical pricing of cleaning contracts.</p> <p>CAF has determined benchmarks for productivity rates and on- costs. This is to assess whether the contract is sufficient to enable cleaners (including employees of any subcontractors) to work within safe productivity levels, and ensure payment of at least minimum wages and entitlements.</p>
	2B) Responsible Contracting – Subcontracting	<p>This Standard aims to ensure responsible and transparent subcontracting where applicable.</p> <p>This involves assessment of subcontractor lists and records, prevention of sham contracting, and compliance with the Taxable Payment Reporting System and any state- based Labour Hire Licensing schemes operational in the local jurisdiction.</p>
	2C) Responsible Contracting – Transparency	This Standard assesses transparency with regard to the auditing and worker engagement process so that compliance with the CAF Standards can be verified.

Standard		Purpose
3. Workplace Health and Safety		This Standard aims to ensure a safe working environment is provided for cleaners. It assesses compliance with Workplace Health and Safety legislation, and workers' compensation and public liability insurance obligations. This Standard also assesses policies and procedures relating to inductions and training, and bullying and harassment.
4. Financial Viability		This Standard assesses whether appropriate financial viability checks have been undertaken by the Owner/ Manager when engaging the Cleaning Contractor at the building. The purpose of this Standard is to ensure that cleaners and the Building Owner/ Manager can have confidence in the financial viability and responsibility of the Cleaning Contractor, and to ensure that reputable Cleaning Contractors are competing on a level playing field.
5. Worker Engagement	5A) Worker Engagement – Education and Consultation	<p>This Standard assesses whether cleaners have been sufficiently educated about and involved in the CAF certification process, and are able to provide reliable verification that their workplace is complying with the CAF Standards.</p> <p>This occurs in the following ways:</p> <ol style="list-style-type: none"> 1. Cleaners attend a minimum of two paid meetings per annum. At the first meeting, which requires the engagement of all stakeholders, cleaners are educated about the <i>CAF 3 Star Standard</i> and given the opportunity to provide feedback via a survey on working conditions at the building. The follow-up meeting involves cleaners, CAF and United Voice, and provides an opportunity for cleaners to speak without employers present. 2. Cleaners nominate a CAF Representative for their building. The CAF Representative receives training by the union to equip them with a good knowledge of cleaners' employment rights and how to advocate on behalf of other cleaners. The CAF Representative monitors the building's ongoing compliance with the CAF Standards. 3. Stakeholders at the building have access to a <i>CAF Compliance Register</i>, where they can report issues relating to the CAF Standards, and also see whether and how they are being resolved. 4. Cleaners are directly involved in determining a building's compliance with the CAF Standards.
	5B) Worker Engagement – Freedom of Association	<p>This Standard aims to ensure that cleaners have the right to freedom of association, with all stakeholders at the building recognising and upholding the rights of cleaners to join and be represented by a union, without hindrance or discrimination.</p> <p>This Standard recognises the role of union membership in promoting safe workplaces and compliance with labour Standards.</p>
6. Remediation		This Standard aims to ensure accountability with the CAF Standards throughout the supply chain by ensuring all relevant stakeholders play an active role in investigating and resolving compliance issues both during the certification process and throughout the certification period.

CAF Building Certification

Overview

Property owners, building managers and tenants are invited to nominate buildings for certification. Cleaning contractors and other participants in the cleaning supply chain are invited to suggest buildings and property owners that may be keen to undergo certification.

Buildings that have at least 18 months left in the contract can be certified. The CAF 3 Star Standard can be applied against existing contractual arrangements and/or implemented through tender processes.

CAF certification participants will be asked to:

- agree to the *CAF Core Principles and Terms and Conditions*;
- pay a certification fee;
- work with CAF and other stakeholders to implement the *CAF 3 Star Standard* at a nominated building, including the completion of an audit;
- engage with cleaners in CAF and participate in a social audit;
- once a building has been certified, sign a *CAF Licensing Agreement*; and
- support CAF's ongoing research and tool development.

CAF certification will last for a maximum of three years subject to ongoing compliance with the CAF Standard, the CAF Terms and Conditions, and the CAF Licensing Agreement.

Audit Process

Participants will be required to work collaboratively with CAF, a registered auditor, the union representing cleaners, United Voice, and other cleaning supply chain participants on site to review the building's practices against the *CAF 3 Star Standard*.

CAF will assign a registered auditor to a building to conduct a desk-based audit. The auditor will provide a report to CAF advising whether the 3 Star Standard has been met.¹

A distinguishing feature of CAF is the involvement of cleaners in the certification process. It is a requirement that workers be educated about the CAF Standard and involved in its implementation so that they can provide reliable verification that the CAF standards are being met on site.

¹ Refer to the privacy statement at the end of the *CAF 3 Star Standard* clarifying what information is provided to CAF in the audit and specifying how this information will be used.

For more information, the [CAF Worker Engagement Protocol](#) details the principles and practices associated with this element of the Standard, including the role and responsibilities of the CAF Representative.

In both the auditor's report and the worker engagement component (social audit), it is highly likely that issues relating to compliance with labour standards will be uncovered at the building undergoing certification. CAF brings together all stakeholders at a building to engage in this process in good faith and in a cooperative manner. CAF will work with all relevant stakeholders at the building to address issues raised and can provide advice to establish and maintain quality and compliant cleaning. The [CAF Remediation Procedure](#) provides more details regarding the role of stakeholders in investigation and remediation.

CAF Certification Fee

The CAF Certification fees will cover the cost of the building audit conducted by the auditor in the first year of certification, plus the cost of CAF's annual social assessment process and administration.

Fee payable	Amount	What it covers
Year 1	\$10,000 (plus GST)	Independent auditor fee + CAF certification fee
Year 2	\$5,000 (plus GST)	CAF certification fee
Year 3	\$5,000 (plus GST)	CAF certification fee
Minimum total fee for the three-year certification of a building	\$20,000 (plus GST)	Certification of one building for three years

The initial audit fee will cover three years of certification and excludes any follow-up or site visits. Any follow-up independent audits directed by the CAF Certification Panel as a result of issues identified will be the responsibility of the property owner, building manager or tenant who nominated the building for certification.

Similarly, there may be additional fees payable as part of any supplementary site visits CAF is required to make. However, these will be determined based on travel and the level of follow-up required, and communicated in advance.

Annual fees must be paid in advance of any certification assessments taking place and are non-refundable.

Fees may be revised periodically as required.

Additional costs associated with certification

As above, part of the audit includes 2 paid time meetings of 30 minutes each with all cleaners (as much as possible) per year. The organising of these meetings will require extra hours/staff to be rostered on to avoid increasing the workload of cleaners on those days. These costs will be met by the property owner/manager.

In addition, CAF will be trialling the implementation of the CAF Representative allowance (see the [CAF Worker Engagement Protocol](#) for details) which aims to compensate nominated cleaners for their work in monitoring CAF compliance at a building.

CAF Representatives will be trained (up to two training sessions per year) to undertake their duties, and assist all stakeholders at a building retain certification. This cost will be borne by the cleaning contractor.

Steps to Building Certification

1. Application for Certification

CAF will publicly announce rounds of building certification and welcome expressions of interest. The property owner/building manager/tenant nominates a building by completing the [CAF Building Certification Application Form](#) on our website. CAF will then notify applicants which buildings have been selected for the intake, and run a pre-registration check by consulting with United Voice and the Fair Work Ombudsman.

2. Agreement to Commence the Certification Process

The property owner/building manager/tenant that nominated the building will have two weeks to complete and deliver the following to CAF to commence certification:

- the signed *CAF Certification Agreement*; and
- payment of the certification fee.

Failure to return the signed Agreement and/or payment of fees on time will result in the building forfeiting its place in that certification intake.

3. Stakeholder Meeting

CAF will arrange an initial meeting with the property owner, building manager, tenant (where applicable), cleaning contractor and United Voice at least one week before certification is due to commence. The participants at this meeting should include nominated representatives who will oversee the certification process on behalf of their organisation. The purpose of this meeting is to answer any outstanding questions, and talk through the process of the audit and the plans for implementing the worker engagement element of the CAF 3 Star Standard at the building.

At this meeting, dates and times for the worker engagement meetings must be communicated to all stakeholders.²

4. Audit

CAF will notify the auditor that the building is undergoing certification, and the auditor will commence the process of collecting documents and information, and organising any site visits as required. All documents must be returned to the auditor by the communicated due date. It is advisable to return documents before the due date to allow opportunity for follow-up and thereby resolve issues that may impede certification.

The auditor will deliver a report outlining their findings to CAF for consideration by the CAF Certification Panel.

² See CAF [Worker Engagement Protocol](#) for detailed guidance.

5. Worker Engagement Meetings

CAF will liaise with the property owner, building manager, cleaning contractor and United Voice to undertake a minimum of two worker engagement meetings (30 minutes each). CAF and United Voice will prepare a report outlining the findings, with the report and any recommendations as a result of the worker engagement process to be deliberated and considered by the CAF Certification Panel.

For full details, see the [CAF Worker Engagement Protocol](#) (Appendix A).

Through the worker engagement process, there is a high likelihood that issues will be raised by cleaners that may require further investigation. To the extent possible, CAF will notify stakeholders prior to the final certification assessment taking place to allow for follow-up as per the [CAF Remediation Procedure](#). This will:

- offer stakeholders at the building the chance to investigate and remediate prior to the certification panel assessment; and
- ensure concerns raised by cleaners are investigated and acted upon in a timely manner.

6. Assessment

The CAF Certification Panel will consider both the audit report and the worker engagement report to determine whether, or to what extent, the building has qualified for CAF certification.

The CAF Certification Panel will provide a letter of recommendation to all stakeholders involved in the building's certification, outlining any steps that may be required to be taken pre- and post-certification to demonstrate compliance with the CAF Standard. Stakeholders will also receive copies of the audit report and worker engagement report (which may include additional suggestions for stakeholders to implement in order to meet best practice), as well as any material relevant to investigations conducted about particular issues that may have been identified at the site (including reports from the cleaning contractor and the union).

If stakeholders are required to take particular steps prior to the building being certified, they will need to demonstrate and provide evidence to CAF that they have implemented the recommendations within the specified timeframes before achieving certification.

For more information about the assessment process see the [CAF Certification Panel Methodology](#) (Appendix B).

7. Certification

Once certification has been obtained, the applicant will be provided with a certificate and access to CAF branding (subject to the terms of the *CAF Licensing Agreement* and trademark

usage guidelines). CAF will work with stakeholders at the building to promote certification across CAF's channels.

In order to maintain certification, stakeholders must demonstrate ongoing compliance over the life of the 3 year certification period (as detailed in the next section). This includes any recommendations included in the letter from the CAF Certification Panel that may be required to be implemented by stakeholders post-certification. This will help to ensure that compliance is not simply reflective of a moment in time but is meaningful, lasting and verifiable, as well as to ensure that there are clear processes in place that allow stakeholders to respond to and address any issues that may arise during the certification period.

Ongoing Compliance

An important part of maintaining CAF building certification is being able to demonstrate ongoing compliance with the CAF Standard.

CAF will set up a [CAF Building Compliance Register](#) for the building into which stakeholders will be able to report issues identified using the *CAF Issue Reporting Form*. Actions taken by stakeholders at the building to investigate and remediate those issues will be documented in the building's compliance register in the spirit of supply chain transparency and accountability. The building's stakeholders' engagement with the compliance register will be assessed during annual health checks.

CAF will provide guidance materials to assist participants to maintain ongoing compliance, including the *CAF Ongoing Compliance Checklist*.

CAF Annual Health Check

After 12 months and 24 months of a building being certified, CAF undertakes an annual health check (AHC). This is to ensure the building continues to uphold the CAF Standard.

- 1) CAF will contact the property owner/building manager/tenant at least 10 business days in advance of the AHC due date with:
 - an invoice;
 - an *Annual Health Check Form*;
 - a request to book worker engagement meetings (must take place within 6 weeks of the request); and
 - any follow-up identified from previous audit reports.
- 2) The property owner/building manager/tenant has 10 business days from notification to complete and send back the above information and pay all fees. Any failure to meet this deadline may result in de-certification.
- 3) CAF, the property owner, building manager, tenant and cleaning contractor will organise a minimum of two worker engagement meetings (30 minutes each) as per the [CAF Worker Engagement Protocol](#). Following the worker engagement meetings, CAF will work together with United Voice and/or the CAF Representative to draft a

report on the outcome of the meetings, and complete the [CAF Building Compliance Register](#).

- 4) Based on the information in the previous auditor's report, evidence of regular compliance check-ins by the property owner/building manager, the compliance register, and the worker engagement report, CAF will determine if there is any follow-up required. This may require parties to engage in remediating any issues as per the [CAF Remediation Procedure](#) and/or the engagement of an independent assessor which, along with any associated fees, will be communicated to the parties following the second worker engagement meeting.
- 5) The deadline for completion of the Annual Health Check will be three months from the AHC due date specified in the notification as per Step 1 above. At times, there may be extensions granted which will be agreed upon by all parties in advance of the deadline.

Your Support and Our Expectations

Throughout the certification process, CAF will:

- provide guidance and detailed information to participants; and
- gather information to assess the progress of building certification.

In addition to the obligations set out above, we ask that participants undertake certification in the true spirit of collaboration by:

- raising issues encountered in a timely manner;
- assisting the research program where possible;
- facilitating CAF and the auditor's requirements to verify the CAF 3 Star Standard requirements in a timely manner; and
- participating in good faith in the [CAF Remediation Procedure](#).

Research and Tool Development

Researchers from the University of Technology Sydney's Centre for Business and Social Innovation (CBSI) are undertaking a research program, which is running concurrently with the certification process. This research program will focus on:

- the development of a best practice approach for a labour standards certification scheme for the cleaning industry in Australia;
- the identification of any gaps in the scheme and development or refinement of CAF resources and tools; and
- the development of an evidence base to assess the effectiveness of a labour standards certification scheme (CAF) in the Australian cleaning industry.

The research program involves the development of case studies (including stakeholder and workplace interviews) and the use of surveys. Where approached by UTS, we would appreciate your help in facilitating this research taking place at your building(s). Research will be conducted with the consent and cooperation of participants (including property owners, building managers, tenants and cleaning contractors). Strict ethical standards and privacy and confidentiality obligations will apply.

To register an expression of interest for CAF Certification:

Please visit <https://www.cleaningaccountability.org.au/apply/>

Appendix A: Worker Engagement Protocol

Purpose

The engagement of cleaners in the implementation of the Cleaning Accountability Framework (CAF) is essential in providing ongoing assurance that relevant CAF standards are being met in a building.

The purpose of the Worker Engagement Protocol is to establish the principles and practices that inform this engagement of workers. It provides clarity for property owners, building managers, tenants, cleaning contractors and cleaners in CAF buildings, and for United Voice as the union representing cleaners.

Principles

- a) Cooperation – CAF is a multi-stakeholder cooperative framework. As such, all parties at a CAF building will use their best endeavours to resolve issues identified as a result of worker engagement in a cooperative manner. All parties will work to ensure that CAF standards are being met and that recognition is accorded where this compliance can be demonstrated.
- b) Best practice – CAF's engagement with workers should identify and recognise 'better' and 'best' practices within the cleaning industry, as well as seek to address any issues identified.
- c) Existing rights and roles – While agreeing to work together cooperatively, all parties at a CAF site retain the ability to exercise their existing rights and roles. These rights and roles include, for example:
 - the negotiating of industrial instruments;
 - the resolution of industrial matters;
 - the day to day running of a union; and
 - the carrying out by property owners, building managers, contractors and workers of their everyday business activities.

CAF in no way seeks to limit or replace the usual activities of a registered organisation such as a union, the Fair Work Ombudsman and other regulatory/government bodies.

- d) Freedom of association – United Voice, as a founding CAF Steering Committee member and the union representing cleaners with established workplace knowledge, will play an important role (see 'Practices') in the worker engagement element of CAF.

In fulfilling this role, United Voice will follow the principles and practices established in this protocol. In particular, United Voice will seek to work with stakeholders to address any issues identified in the CAF certification process in a cooperative manner, as outlined in the [CAF Remediation Procedure](#).

United Voice will provide written notification to the cleaning contractor in advance of visiting a site. This notification will specify the dates and times of site visits and buildings to be visited and prior permission will need to be granted by the cleaning contractor. There may be times when United Voice must use formal Right of Entry powers to seek access to a workplace for the purposes of carrying out discussions with potential members.

The CAF Standard upholds the international principle of freedom of association. In order to demonstrate a commitment to this fundamental right, the parties understand that United Voice and its representatives will be inviting cleaners to join the union. Subject to agreement with the contractor, this may happen at annual site meetings and in conversations with cleaners that occur during ongoing site visits (see 'Practices').

- e) Independence, neutrality & integrity – CAF as an entity is independent of any one of its individual stakeholders and interest groups. As such, CAF should be presented to workers as an independent entity.

However, it is also recognised that to ensure the integrity of the information collected by CAF, workers will need the opportunity to speak with United Voice representatives and/or CAF workplace representatives without other parties present.

- f) Confidentiality – All information collected by CAF or United Voice through engagement with workers as part of CAF certification will only be used for CAF purposes. A CAF privacy statement is included at the end of CAF's 3 Star Standard. Where worker or member information is collected by United Voice as part of its ordinary business, the usual restrictions and obligations under the Privacy Act and Fair Work (Registered Organisations) Act will apply.
- g) Evidence-based – CAF's certification scheme is based on available evidence of what is workable and likely to enhance supply chain assurance in relation to labour standards.

Worker feedback is important in creating this evidence base. CAF will have no reason to disbelieve workers who raise grievances or issues, nor will CAF disbelieve a cleaning contractor, building manager or other stakeholder until the matter has been fully and adequately investigated as per the [CAF Remediation Procedure](#) (Appendix D).

- h) Transparency – The engagement of workers will help inform the CAF Certification Panel's decision to certify a building. CAF's processes relating to auditing and certification will be transparent and are set out in the *Guide to the Cleaning Accountability Framework Building Certification Scheme*.
- i) Scope – In engaging workers, CAF and United Voice, will be mindful of the scope of their role, and that CAF is focused on providing assurance in relation to the CAF Standard.

Practices

- (a) Annual site meetings – At each CAF building, an annual meeting will be held with the cleaning workforce (including subcontractors and employees of subcontractors). This meeting will be divided into two blocks of 30 minutes each, with the second follow-up meeting taking place approximately two weeks after the first.

The meetings will be arranged at an agreed time and location by the site's building manager. The cleaning contractor will communicate the meeting details to staff by issuing an invitation to the cleaning workforce and will provide a copy of the invitation and list of invitees to all CAF stakeholders involved in the meeting.

The cost of holding the meetings will be covered by the property owner – cleaners will subsequently be paid by the contractor to attend the meetings. It is expected that where the meetings take place during the cleaners' shift, additional staff/hours are provided so there is not an increase in workload.

It is expected that the cleaning contractor and property owner and/or building manager will endeavour to ensure that a majority of cleaners are able to participate in these meetings (90% attendance threshold for commercial sites and 80% for retail sites).

The first meeting will involve CAF, the property owner and/or building manager, the cleaning contractor, United Voice and the cleaners on that site. The primary purpose of this meeting will be to provide an overview of CAF and the 3 Star Standards, explain why cleaners are important in maintaining CAF standards on a site, and provide an opportunity for each stakeholder to explain why CAF is important to them. At the conclusion of this meeting, cleaners will be provided with a survey and CAF Representative nomination form (where a CAF Representative is not already in place).

The second meeting will involve CAF, United Voice and the cleaners, and is an opportunity for cleaners to speak without employers present. This meeting will follow up on the results of the survey and questions related to CAF Representatives, and will provide an opportunity for cleaners to raise any questions about CAF and any workplace issues related to the CAF Standard. This meeting is also an opportunity for United Voice to invite cleaners to join the union where contractor consent has been given.

- (b) CAF Representatives

CAF Representatives should be elected at a meeting of the cleaning workforce by their fellow cleaners. A CAF Representative cannot be a supervisor or manager, and is someone who cleaners feel represents their interests, and who they feel comfortable raising issues with. CAF Representatives will rely on the support of United Voice as they are the best placed stakeholder to provide training and support, and have experience in working with cleaners to build leadership, representation and advocacy skills.

The CAF Representative will receive an allowance to compensate them for performing additional CAF duties and to provide recognition of their responsibility to represent and advocate on behalf of their colleagues. The cost will be covered by the property owner and is included as an item in the *CAF Pricing Schedule*.

The CAF Representative Allowance is based on the leading hand allowance in the Cleaning Services Award. It is an hourly rate based on the number of cleaners the CAF Representative looks after, rather than a flat site allowance. In other words, the allowance is payable to the CAF Representative on the basis of the number of cleaners they support and represent.

The CAF Representative Allowance hourly rates are set out below:

CAF Representative Allowance - 1 to 10 employees	\$1.25 per hour, up to a maximum of \$47.47 per week
CAF Representative Allowance - 11 to 20 employees	\$1.61 per hour, up to a maximum of \$61.07 per week
CAF Representative Allowance - over 20 employees	\$1.97 per hour, up to a maximum of \$74.68 per week

For part-time cleaners working 20 hours a week, this will amount to the following:

- 1 to 10 employees: \$25.00 per week
- 11 to 20 employees: \$32.20 per week
- 20+ employees: \$39.40 per week

For the purposes of payment of annual leave and superannuation contributions, the CAF Representative Allowance will be considered as ordinary pay and will be included in the calculations (i.e. as per the provisions in the Award relating to the leading hand allowance, ordinary pay means remuneration for the employee's normal weekly number of hours of work calculated at the ordinary time rate of pay and in addition will include the CAF Representative Allowance).

The CAF Representative will be given regular opportunities to meet with new starters to educate them about CAF. This may happen on-site as part of their shift or off-site by agreement as an additional paid shift. The purpose of induction sessions with new starters is to:

- present the workers with agreed information on CAF;
- inform them that they are working at a CAF building and explain what this means; and

- explain how the CAF standards must be monitored by workers.

(c) CAF Representative training, recognition and ongoing support – United Voice will offer training for CAF Representatives. The purpose of this training will be to:

- provide the representatives with agreed training material;
- develop their conversation and representation skills;
- provide them with copies of CAF documents relevant to their site to enable them to understand the CAF Standard that their building is certified to; and
- provide them with any other information that they need to perform their role.

The employer of the CAF Representative will pay them for all time spent at training (with a maximum of two training sessions per CAF Representative per year with each training session to be paid as ordinary work hours for that employee for the day).

(d) Ongoing site visits – United Voice may visit CAF buildings to support CAF Representatives and cleaners in the implementation and monitoring of the CAF Standard. As per this protocol, the union will provide written notification to the cleaning contractor in advance of visiting a building. It is anticipated that during the first year of certification there will be regular visits by the union to support the work of the CAF Representative and to ensure that the worker engagement element of the 3 Star Standard is being implemented.

Appendix B: CAF Certification Methodology

CAF's approach to certifying buildings and contractors is based on verifying that the requirements of the applicable CAF Standard are met.

CAF will adopt the following key principles when considering applications for certification and:

- will be guided only by evidence, as opposed to promises, of compliance;
- may prevent certification being awarded until any identified issues of legal non-compliance have been fully rectified;
- may prevent certification being awarded until any identified issues of non-compliance with oversight processes have been addressed and/or rectified;
- considers the worker engagement component of the CAF Standard core to the integrity of the scheme and as such a compulsory requirement; and
- will allow opportunities for rectifications and re-application to be made where issues have been identified, at the cost of the applicant.

Completed audit and worker engagement reports will be considered by the CAF Certification Panel. The following steps will be taken:

- 1) The Panel will consider recommendations presented by CAF on the basis of the audit and worker engagement reports and a decision will be made on whether the applicant has sufficiently met the applicable Standard criteria.
- 2) A Letter of Recommendation will be provided to the relevant stakeholders (property owner, building manager, tenant if applicable, cleaning contractor, and United Voice) outlining the recommendation(s) of the CAF Certification Panel.
- 3) Where an applicant has successfully achieved certification, CAF will provide a certificate attesting to this fact.
- 4) Where an applicant has failed to achieve certification in the first instance, CAF will provide recommendations and assistance on how to proceed.

Where an entity disagrees with the decision of the CAF Certification Panel, they will have recourse to the *CAF Dispute Resolution Procedure* (found in the *CAF Certification Agreement*).

As part of the CAF certification process, entities will have the opportunity to address any issues that are identified in the course of the audit. Where the follow-up process has not met the requirements as per the Letter of Recommendation, CAF will refer the matter to the Certification Panel.

CAF will take all care in seeking to verify that the applicable CAF Standard is being complied with, but is in no way responsible for ensuring ongoing compliance by cleaning contractors, property owners, building managers or tenants.

CAF reserves the right to withdraw certification from a building at any time as per the CAF Remediation Procedure.

Appendix C: CAF Certification Panel Governance

Role

The role of the Panel is to consider assessment reports and on this basis decide whether a building or cleaning contractor should be awarded CAF certification. The Panel will also act as the forum for raising and considering any disputes related to CAF certification, as per the *CAF Dispute Resolution Procedure* (found in the *CAF Certification Agreement*).

CAF certification depends on meeting the requirements set out in the CAF Standard.

Responsibilities

The Panel is responsible for:

- a) Reviewing the audit report provided by the auditor/assessor, and the worker engagement report provided by CAF and United Voice, and deciding if a building/contractor should be certified according to the nominated CAF Standard.
- b) Reviewing annual health check reports.
- c) Making recommendations that address any issues identified in the audit report, worker engagement report, or any other report. Recommendations should aim to result in the building/contractor being certified or maintaining certification. Appropriate deadlines for the implementation of any recommendation will be established.
- d) Manage disputes in accordance with the *CAF Dispute Resolution Procedure*.
- e) Declare and manage any conflicts of interest in accordance with CAF's *Conflict of Interest Policy*.
- f) Make a decision where a case is made for revocation of certification.
- g) Report to the CAF Steering Committee at its meetings. Reports will include:
 - the number and types of certifications issued;
 - the number and types of certification applications received;
 - the number of disputes and revocations; and
 - any identified non-compliance issue that impacts the credibility of the certification scheme.

Certification Review

The Panel takes into account the following information when reviewing the audit and worker engagement reports:

- recommendations made by the auditor/assessor;
- feedback from cleaners received through worker engagement channels; and
- any reports, follow-up or additional commentary provided by relevant parties as part of the certification process.

After considering the audit report and worker engagement report (and any other relevant materials), the Panel will have 14 days to issue a letter outlining its findings to all participants.

The Panel reserves the right to revoke certification in accordance with the *CAF Certification Agreement*.

Authority

The Panel is authorised by the CAF Steering Committee. The Panel must seek endorsement from the Steering Committee for any changes to the composition, roles and responsibilities of the Panel.

Composition

The composition of the Panel is established by the CAF Steering Committee. The Panel will comprise of:

- Chairperson
 - Chair of the CAF Steering Committee
- Members
 - CAF Secretariat (non-voting)
 - United Voice representative
 - University of Technology Sydney representative
 - Fair Work Ombudsman representative (non-voting)
 - Industry representative

In the Chair's absence, the Panel may elect an interim Chairperson from its members, including a non-voting member.

No business may be carried out unless a quorum is present, in this case a majority of Panel members.

Members may nominate a proxy to attend a meeting on their behalf with prior approval from the CAF secretariat. The proxy must be from the same organisation as the Member and will have the same voting rights.

The work of the Panel may take place either via meetings or written correspondence.

Integrity and Accountability

Members are required to abide by the CAF Core Principles.

Panel members are bound by CAF's *Conflict of Interest Policy*. This policy provides that a member of the CAF Certification Panel must disclose any material personal interest or any potential or perceived conflict of interest. A member with a material personal interest in a matter:

- must not be present while the matter is being considered; and
- must not vote on the matter.

The Panel will consult with the CAF Steering Committee on relevant issues pertaining to conflicts.

Administration

Panel meetings take place as required.

Declaration of any conflict of interest will be a standard agenda item. Any conflict of interest is declared in accordance with CAF's *Conflict of Interest Policy*.

Appendix D: CAF Remediation Procedure

Purpose of the CAF Remediation Procedure

The intention of the *CAF Remediation Procedure* (CRP) is to facilitate the timely resolution of reported breaches of the CAF 3 Star Standard between the parties involved in the Cleaning Accountability Framework, recognising the importance of all parties being accountable for their compliance. It is important to note that nothing in this procedure will restrict, fetter or otherwise affect any rights, obligations or remedies available to parties under the Fair Work Act or other workplace laws and agreements.

The CRP provides guidance to stakeholders at a building applying for certification and for the duration of certification. The CRP will help to ensure that breaches of the CAF Standard are identified, investigated, and resolved in a timely and transparent manner by relevant stakeholders at the site implementing appropriate corrective action and mechanisms to prevent reoccurrence.

The CRP prescribes stakeholder actions for issues identified during the application for building certification, during annual health checks, and on an ad hoc basis throughout a building's three-year certification period.

The CRP provides CAF stakeholders with clear expectations of steps to be followed when non-compliance is reported by cleaners at their workplace, and what measures are required to be undertaken to achieve or maintain CAF building certification.

Any grievance, industrial dispute, or concern that relates to compliance with the CAF Standard and that is likely to create a dispute between either the cleaners, United Voice, the Cleaning Contractor, the Manager, and/or Owner should be dealt with as set out below, except where the Cleaning Services Award 2010, an applicable enterprise bargaining agreement, or any other legal mandate prescribes otherwise.

Parties to the CAF Remediation Procedure

CAF

CAF's role is to direct relevant parties and stakeholders at the site to investigate and resolve issues of non-compliance with the CAF Standard, but CAF is not directly involved in that investigation and remediation.

Upon review of evidence, CAF may make recommendations to parties on corrective action and preventative action that will ensure the CAF 3 Star Standard is implemented.

Relevant parties will provide evidence of investigation and remediation of issues identified at the site to CAF, who in turn, will inform the CAF Certification Panel if required.

CAF Certification Panel

Where a serious or systemic breach has occurred, the CAF Certification Panel will determine whether the investigation and (if required) remediation undertaken provide sufficient assurance that the building meets the CAF Standard. The Certification Panel may also propose additional requirements.

United Voice

United Voice jointly produces the worker engagement report with CAF. As a registered organisation and the union for cleaners, United Voice has the requisite skills, experience and independence to communicate with cleaners and identify and to assist relevant stakeholders in addressing issues of non-compliance at a building.

Owner/Manager

The Owner and Manager both have a key role to play in issue identification and remediation. Property owners hold significant power in the supply chain and their oversight and management of compliance with the CAF Standard is critical to ensuring that cleaners' rights are respected in their building. CAF expects the Owner/Manager to work with the cleaning contractor and any other relevant stakeholders at the site to the fullest extent possible to investigate and remediate breaches of the CAF 3 Star Standard.

Cleaning Contractor

As the cleaners' employer, the Cleaning Contractor is integral to investigating and remediating any issues of non-compliance with the CAF Standard. CAF expects Cleaning Contractors to work cooperatively with United Voice, the CAF Representative, cleaners, the Manager and/or Owner in a transparent manner to ensure that the CAF 3 Star Standard is met.

Cleaners

The role of cleaners is to participate in the identification, investigation and remediation of issues to the best of their abilities, and according to their level of comfort.

CAF Representative (after certification)

The CAF Representative is nominated by their peers at the building to monitor compliance with the 3 Star Standard and raise issues on behalf of other cleaners to maintain compliance with the 3 Star Standard once a building has obtained certification. All stakeholders at the building should meaningfully engage with and support the CAF Representative when investigating and remediating compliance issues.

*** Note on anonymous reports by cleaners**

Cleaners may raise issues on an anonymous basis, with many stating they fear retribution from their employer if they put their name to a complaint. The workers in question may have low English language competency and they may be working in Australia on a temporary work visa, which makes them vulnerable in the labour market. Cleaners' fear of losing their job or being moved to a more difficult site or given undesirable duties as a form of retribution should be acknowledged by all stakeholders.

Anonymous reports of bullying and/or harassment, unpaid overtime, or other breaches of the CAF Standard are worthy of full and proper consideration. While anonymous reports may make it difficult to rapidly investigate claims and resolve breaches against specific workers, they needn't prevent the issues being investigated at the site and collective remedies being implemented. CAF has dealt with this at a number of buildings and is able to provide suggestions on collective preventative actions.

Steps to identify, investigate and remediate issues

The steps to be taken to investigate and remediate breaches of the CAF Standard are identified below according to whether they are suggestive of critical, major, serious, or minor breaches of the CAF 3 Star Standard; and according to whether they are reported during the application for certification, at the annual health check, or on an ad hoc basis throughout the certification period. Please refer to the [Classification of Compliance Issues](#) table for examples of what constitutes a critical, major, serious, or minor breach.

1. During the application for building certification

1.1 Critical issues

CAF will contact owners directly to report critical issues (e.g. modern slavery) or issues that suggest the practice is driven from the upper management level of the Cleaning Contractor as soon as we become aware of them. In such an event, CAF will not notify the Cleaning Contractor. This is to protect cleaners and prevent the Cleaning Contractor from hiding the issue and removing cleaners and evidence from the site.

1.2 Major or serious issues

This is the process to follow for major or serious breaches, where cleaners' safety and wellbeing may be at immediate risk and an investigation and remediation is urgent. The procedure is different according to whether the cleaning contractor is CAF-Prequalified or not.

1.2.1 Non-prequalified cleaning contractors

When cleaners raise major or serious issues, CAF will notify the Owner/Manager, the Cleaning Contractor, and United Voice as soon as practicable, outlining the issue(s) reported and requesting acknowledgement of receipt within 48 hours and an investigation by relevant stakeholders within 10 business days.

- If the investigation by relevant stakeholders at the site corroborates the issue(s) raised by cleaners, CAF will advise appropriate timeframes to remedy the issue and what evidence to provide to CAF. At times this may involve engaging an independent assessor. CAF will consult with United Voice and the CAF Certification Panel to this end.
- If the investigation does not corroborate the issue(s) raised by cleaners because it/they were reported anonymously, are subjective in nature or otherwise difficult to quantify, CAF will recommend that stakeholders at the site immediately implement proactive measures to prevent the type of issue(s) reported (re)occurring. CAF will detail specific measures needed to be taken in this instance, in consultation with United Voice.

CAF will complete the worker engagement report with all the issues raised by cleaners in the worker engagement process, in consultation with United Voice, detailing:

- any investigation and remediation undertaken by relevant stakeholders at the site in relation to the major or serious issues, and any proactive measures implemented to reduce the risk of (re)occurrence, and
- any minor issues raised by cleaners that may require subsequent investigation and remediation.

1.2.2 CAF-Prequalified cleaning contractors

When cleaners raise major or serious issues, and where a CAF Prequalified Cleaning Contractor is involved in the building certification, CAF will notify the Cleaning Contractor of the issue(s) in the first instance, giving the Cleaning Contractor up to 10 business days to investigate and report back to CAF with a corrective action plan to implement.

- If the investigation corroborates the issue(s) raised by cleaners, CAF will advise appropriate timeframes to remedy the issue and what evidence to provide to CAF. At times this may involve engaging an independent assessor. CAF will consult with United Voice and the CAF Certification Panel to this end.
- If the investigation does not corroborate the issue(s) raised by cleaners because it/they were reported anonymously, are subjective in nature or otherwise difficult to quantify, CAF will recommend that stakeholders at the site immediately implement proactive measures to prevent the type of issue(s) reported (re)occurring. CAF will detail specific measures needed to be taken in this instance, in consultation with United Voice.

CAF will then notify the Owner/Manager so that they have oversight of the issue(s) and can have confidence that they are being addressed.

CAF will then complete the worker engagement report with any other minor issues (see 1.3) raised by cleaners in the worker engagement process, in consultation with United Voice, detailing:

- any investigation and remediation undertaken by relevant stakeholders at the site in relation to the major or serious issues, and any proactive measures implemented to reduce the risk of (re)occurrence, and
- any other minor issues raised by cleaners that will require subsequent investigation and remediation.

The differential process for prequalified contractors is in recognition of these companies having demonstrated the ability to investigate and remediate reported compliance issues.

1.3 Minor Issues

This is the process to follow for minor issues where cleaners' safety and wellbeing is not at immediate risk.

CAF, in consultation with UV, will complete the worker engagement report based on feedback provided by cleaners through the survey, the CAF worker engagement meeting, and any follow up communication cleaners have with UV subsequent to the meeting.

The process is the same for Prequalified and non-Prequalified Cleaning Contractors.

Assessment of the worker engagement report by the Certification Panel

CAF will submit the worker engagement report to the CAF Certification Panel, along with stakeholders' documentation and evidence relating to any investigation and remediation of the major and serious issues reported. These documents will be considered by the Certification Panel alongside the desk-based audit report.

The Certification Panel will issue a letter of recommendation and any requirements to be met either prior to certification being awarded, or in the 12 months following certification, depending on the severity of the issue they relate to.

Upon receipt of the Certification Panel's letter of recommendation and requirements for certification, relevant stakeholders are to conduct an investigation of the minor issues, and any major or serious issues that have been deemed by the certification panel not to have been adequately investigated and remediated. The amount of time provided for investigation will differ based on the complexity of each issue, with indicative timeframes varying between 10 business days and 28 days from receipt of the letter of recommendation. CAF will provide guidance on appropriate investigation and remediation.

Evidence of the investigation and actions to be undertaken in response are to be reported to CAF.

Where CAF believes the investigation and remediation (or lack thereof) still does not meet the standard, the Certification Panel will make a decision on whether to:

- a) certify, or
- b) certify following additional remediation, or
- c) not certify.

If the building obtains certification, over the next 12 months, CAF will maintain ongoing communication with cleaners at the building via the CAF Representative and United Voice.

Classification of Compliance Issues

Issue Rating	Definition	Examples of Issues and their Impact
Critical issue	Issue is suggestive of criminal exploitation / modern slavery.	<p>Examples</p> <ul style="list-style-type: none"> Cleaners are not free to leave their employer or place of employment Sexual abuse or harassment Aggressive harassment Cleaners' passports/identity documents have been confiscated Cleaners are subject to immigration-related threats <p>Impact</p> <ul style="list-style-type: none"> Impacts at least one cleaner
Major issue	Issue is a major non-conformance with the CAF Standard and/or a systemic or recurring issue that requires in-depth investigation and a remediation plan, and could trigger an additional audit and/or result in the building not obtaining certification or certification being removed.	<p>Examples</p> <ul style="list-style-type: none"> Unsafe or significant increase in workloads Cleaners are underpaid Cleaners are unable to take sick leave Cleaners forbidden from talking to the union Cash in hand work Bullying and harassment Cleaners engaged on ABNs <p>Impact</p> <ul style="list-style-type: none"> Reported by a large number of cleaners Impacts the majority of cleaners on site
Serious issue	Issue is a more complex non-conformance with the CAF Standard that requires	<p>Examples</p> <ul style="list-style-type: none"> Cleaners report high workloads or working unpaid overtime Cleaners are underpaid

	further investigation by CAF stakeholders and a remediation plan.	<ul style="list-style-type: none"> • Cleaners are unable to take sick leave • Bullying and harassment • Cleaners discouraged from talking to the union • Cash in hand work • Cleaners engaged on ABNs <p><u>Impact</u></p> <ul style="list-style-type: none"> • Reported by numerous cleaners • Impacts a large proportion of cleaners on site
Minor issue	Issue is a clear non-conformance of the CAF Standard and is able to be investigated and readily resolved.	<p><u>Examples</u></p> <ul style="list-style-type: none"> • Insufficient evidence to demonstrate compliance with the CAF Standard • Cleaners not receiving information sheets during induction • Isolated reports of bullying and harassment • Cleaners not receiving pay slips • Cleaners discouraged from talking to the union <p><u>Impact</u></p> <ul style="list-style-type: none"> • Reported by at least one cleaner • Impacts a small proportion of cleaners on site
Not a CAF issue	Issue is not a breach of the CAF Standard and should be addressed outside of CAF	<p><u>Example</u></p> <ul style="list-style-type: none"> • Cleaners on rolling fixed term contracts