



CLEANING
ACCOUNTABILITY
FRAMEWORK

CAF STANDARD METHOD STATEMENT

OWNER/ MANAGER

(RETAIL MALLS)

CAF Standard method statement: Owner/Manager (Retail malls)

IMPORTANT: CAF Standard usage statement: The full version of the CAF Standard is only intended for use by CAF stakeholders, i.e. parties at a site going through CAF building certification, parties that have nominated a site for CAF certification, CAF Advisory Group members, CAF Steering Committee members, auditors on the CAF Panel of Auditors, and the nominated researchers from the University of Technology Sydney's Centre for Business and Social Innovation (CBSI). Any unauthorised use, reproduction or distribution of the Standard will be considered a breach of the [CAF Terms and Conditions](#) and may result in revocation of CAF certification or membership. Further distribution of the CAF Standard will be at the sole discretion of CAF, and any requests should be made in writing to the CAF Secretariat.

CAF Standard

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CAF Standard 1. Labour

This standard assesses compliance with the Fair Work Act 2009 (FWA), the National Employment Standards (NES) and any applicable industrial instrument e.g. Cleaning Services Award 2010 or collective agreement, tax and superannuation obligations relating to the employment of cleaners, and legislation governing the employment of migrant workers.

Assessable elements aligned with domestic legislation and international standards include:

- Employment policies and procedures
- Conditions of employment
- Record keeping
- Induction and training
- Job security at change of contract¹
- Freedom of association

1A) Employment policies and procedures

Standard element		Compliance criteria	Suggested evidence for assessment of compliance
1A.1	Maintain relevant employment policies and procedures.	1. A labour standards clause in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this standard. 2. Disclosure of any legal disputes relating to the Cleaning Contractor's compliance with the <i>Fair Work Act</i> or <i>National</i>	<ul style="list-style-type: none">• Cleaning contract or other contractual arrangement with the cleaning contractor• Evidence of requests for disclosure of any legal disputes at the point of tender and explanation of due diligence regarding implementation of processes
1A.2	Educate employees on their workplace rights.		
1A.3	Prevent sham contracting.		
1A.4	Provide a workplace of free and voluntary employment.		

¹ NB CAF's job security at change of contract requirement aims to promote job security for cleaners and reduce labour turnover at change of contract. In line with international standards relating to secure work, it seeks to ensure that cleaners do not lose their job as a result of a change of contract.

1A.5	Provide a workplace free from abuse, harassment and discrimination.	<i>Employment Standards</i> from the previous 24 months is obtained at the point of tender, and verification that the contractor has implemented processes to prevent reoccurrence. 3. Labour standards compliance checks on the cleaning contractor to verify that cleaners’ employment conditions are in line with minimum legal standards relating to fair pay, and safe and secure work. 4. For sites in Victoria, Labour Hire License checks are undertaken at the point of tender or prior to engagement of the Cleaning Contractor.
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1B.2	Employees receive a duty/work schedule outlining their duties.	line with minimum legal standards relating to fair pay, and safe and secure work. After a 3 Star rating has been awarded: 2. Ongoing compliance monitoring using the CAF Ongoing Compliance Checklist	findings, etc.) within the past 24 months or since the start of the contract.
1B.3	Employees are paid in accordance with the Award or Agreement. Where the Award rate is higher than the rate in the Agreement, employees are paid at the higher rate.		
1B.4	Pay employees’ wages into their bank accounts (no cash wages).		
1B.5	Manage overtime and penalty rates in accordance with the relevant Award or Agreement.		
1B.6	Provide employees with correct paid and unpaid leave entitlements (annual, personal and carers’ leave, parental leave, family and domestic violence leave, compassionate leave, and any other leave specified in the applicable instrument).		
1B.7	Comply with any Portable Long Service Leave legislation applicable in the jurisdiction.		
1B.8	Comply with all superannuation guarantee and tax obligations relating to employees, including PAYG withholding and ATO reporting obligations.		
CAF Resources			

<ul style="list-style-type: none">CAF Ongoing Compliance ChecklistCAF Compliance Register			
1C) Record keeping			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
1C.1	Maintain records relating to employment, working hours, wages, superannuation, leave entitlements (all types), in accordance with relevant legislation.	Nil	Nil
1C.2	Ensure accurate and timely payment of wages and provision of pay slips.	1. Labour standards compliance checks on the cleaning contractor to verify that cleaners’ employment conditions are in line with minimum legal standards relating to fair pay, and safe and secure work. After a 3 Star rating has been awarded: 2. Ongoing compliance monitoring using the CAF Ongoing Compliance Checklist.	<ul style="list-style-type: none">Evidence of labour standards compliance checks (meeting minutes, spot check findings, etc.) within the past 24 months or since the start of the contract.
1C.3	Ensure pay slips contain all required information, and in addition, employees’ annual leave balance.		
CAF Resources <ul style="list-style-type: none">CAF Ongoing Compliance ChecklistCAF Compliance Register		External Resources	
1D) Induction and training			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
1D.1	Provide a mandatory paid general and WH&S induction to all new employees.	1. Labour standards compliance checks on the cleaning contractor to verify that	

1D.2	Provide ongoing paid training for workers.	cleaners' employment conditions are in line with minimum legal standards relating to fair pay, and safe and secure work. After a 3 Star rating has been awarded: 2. Ongoing compliance monitoring using the CAF Ongoing Compliance Checklist.	
CAF Resources <ul style="list-style-type: none">● CAF Ongoing Compliance Checklist● CAF Compliance Register		External Resources	
1E) Job security at change of contract			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
1E.1	Cleaners are offered the opportunity to continue working at the site when there is a change of cleaning contract. Redeployment and redundancy provisions apply where cleaners do not wish to stay on.	<p>1. A job security at change of contract clause in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this Standard.</p> <p>Before change of contract:</p> <p>2. Meet with the Incoming Contractor and Outgoing Contractor to inform them of their obligations to cleaners and of the transition arrangements. (Refer to compliance criteria for Standard 1E for Cleaning Contractors in appendix)</p> <p>3. Facilitate site meetings with cleaners to ensure all cleaners are consulted about employment opportunities and transition arrangements.</p>	<ul style="list-style-type: none">● Cleaning contract or other contractual arrangement with the cleaning contractor● Record of meetings with Incoming Contractor and Outgoing Contractor as per compliance criterion 2 at left● Record of meetings with cleaners being facilitated as per compliance criterion 3 at left● Record of oversight of transition as per compliance criterion 4 at left

		<div>4. Check Incoming Contractor and Outgoing Contractor compliance with Standard 1E) during the transition period.</div> <div>5. Request access to relevant Cleaning Contractor documentation for the purposes of ensuring compliance, and keep Cleaning Contractor documents on file, including:<div><div>a. Records of meetings with cleaners</div><div>b. List of cleaners who expressed an interest in remaining employed on site</div><div>c. List of cleaners who were offered employment at the site</div><div>d. List of cleaners who were offered continued employment with the Outgoing Contractor</div></div></div>	
<div>CAF Resources</div> <div><div>●</div>Cleaning Contractor method statement</div>		<div>External Resources</div>	
1F) Freedom of association			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
1F.1	All stakeholders recognise and uphold the right of cleaners to join and be represented by a union, without hindrance or discrimination.	1. There is a <i>freedom of association</i> clause in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this standard.	6. Cleaning contract or other contractual arrangement with the cleaning contractor

		<div><div><div>2. Acknowledgement and support of the fundamental principle of freedom of association, recognising the right of cleaners to join, participate in and be represented by their union, without hindrance or discrimination.</div><div>3. Site-based Owner/Manager personnel and Cleaning Contractor supervisors and managers do not discourage cleaners from joining or speaking to their union.</div><div>4. Facilitate reasonable union access to cleaners at the building where this is not already happening via the Cleaning Contractor.</div></div><div>After a CAF rating has been awarded:</div><div><div>5. Consultation with the CAF Representative and the union to resolve any freedom of association issues as they arise (as per the <i>CAF Remediation Procedure</i>).</div></div></div>	
<div>CAF Resources</div> <div><div>• CAF Remediation Procedure</div><div>•</div></div>		<div>External Resources</div>	
<div>CAF Standard 2. Responsible Contracting</div> <div>This standard seeks to ensure that contract cleaning services are procured, delivered and managed transparently and responsibly.</div>			

In order to promote transparent and ethical pricing of cleaning contracts, CAF has determined [benchmarks](#) for productivity rates and on-costs. This is to determine whether the contract is sufficient to enable cleaners (including employees of any subcontractors) to work within safe productivity levels and be paid at least minimum wages and entitlements.

Subcontracting, where undertaken, is to be conducted transparently and responsibly.

2A) Pricing

Standard element	Compliance criteria	Suggested evidence for assessment of compliance
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2A.1	Meet the CAF benchmarks for productivity rates and on-costs.	<ol style="list-style-type: none"> 1. Use the <i>CAF Pricing Schedule</i> and benchmarks in tender processes (where relevant). 2. Completed <i>CAF Pricing Schedule</i> for the building undergoing certification. 3. CAF on-cost and productivity benchmarks are met or exceeded. 4. Where the <i>CAF Pricing Schedule</i> does not meet the CAF benchmarks, work with the Cleaning Contractor to take the necessary steps to meet the cost and productivity benchmarks, if required (e.g. rebalancing the allocation of existing cleaning resources, or specifying a greater/lesser allocation of cleaning resources, or varying the contract price/specifications). 5. Completed <i>CAF Pricing Schedule</i> kept on file. <p>After a 3 Star rating has been awarded:</p> <ol style="list-style-type: none"> 6. The <i>CAF Pricing Schedule</i> is amended when there are any significant variations to contract specifications and/or tenancy arrangements, and a copy is provided to CAF. 	<ul style="list-style-type: none"> • CAF Pricing Schedule
CAF Resources <ul style="list-style-type: none"> • CAF Pricing Schedule (Commercial) 		External Resources	

2B) Subcontracting ²			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
2B.1	Subcontracting of core cleaning services is only undertaken with the agreement of the owner.	<ol style="list-style-type: none"> 1. Subcontracting clause in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this Standard. 2. Cleaning Contractor to obtain permission before subcontracting any contractual services. 3. Maintain a list (supplied by the Cleaning Contractor) of any subcontracted cleaning services and companies who are authorised Subcontractors – the list should specify what hours/shifts are being subcontracted (where relevant). 4. Monitor whether cleaners attending the site are those employed by the Cleaning Contractor or Subcontractor. 5. For sites in Victoria, the Cleaning Contractor is licensed by the Labour Hire Authority.³ 6. Conduct random spot checks to ensure cleaners are rostered and employed by the Cleaning Contractor or by the authorised Subcontractor. 	<ul style="list-style-type: none"> ● Cleaning contract or other contractual arrangement with the cleaning contractor ● Detail of approval process for subcontracting ● Record of subcontractor lists sent to Owner/Manager by Cleaning Contractor over the past 24 months or since the start of the contract ● Evidence of reconciliation of sign-in systems against employee lists and rosters, including their frequency and any identified exceptions ● Record of investigation and remediation of unauthorised subcontracting if any has been detected over the past 24 months or since the start of the contract
2B.2	If subcontracting of core cleaning services is carried out, do so in compliance with contract conditions and ensure that 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.		
2B.3	Use licenced labour hire providers where required.		
2B.4	Maintain written agreements with subcontractors.		
2B.5	Monitor and enforce subcontractors' compliance with labour standards.		

² This standard relates to subcontracting of non-specialist / core cleaning services.

³ From 29 April 2019, cleaning contractors will have six months to apply for a licence to operate in Victoria.

		After a 3 Star rating has been awarded: 1. Monitor ongoing compliance using the CAF Ongoing Compliance Checklist.	
CAF Resources		External Resources <ul style="list-style-type: none">https://labourhireauthority.vic.gov.au/	
2C) Transparency			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
2C.1	All stakeholders commit to supply chain transparency.	Assessable through the audit process.	<ul style="list-style-type: none">Cleaning contract or other contractual arrangement with the cleaning contractorBuilding sign-in recordsContractor hours of attendance recordsList of subcontracted services and authorised subcontractorsEvidence of processes in place to ensure the Cleaning Contractor provides the auditor with access to relevant documents in the established timeframesAny relevant information collected by the Owner/Manager to ensure Cleaning Contractor compliance
2C.2	Relevant stakeholders ensure access to documents to permit assessment of compliance with the CAF Standard.	<ul style="list-style-type: none">A transparency clause in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this Standard.Relevant documentation and access provided to the Auditor to verify compliance with the CAF Standards.Require the Cleaning Contractor to provide relevant documentation and access to the Auditor to verify they are complying with the CAF Standards. <p>After a 3 Star rating has been awarded:</p> <ul style="list-style-type: none">Ongoing compliance monitoring using the <i>CAF Ongoing Compliance Checklist</i>.	
CAF Resources <ul style="list-style-type: none">CAF Compliance Register		External Resources	

CAF Standard 3. Safe working conditions			
<p>This standard aims to ensure a safe working environment is provided for cleaners. It assesses compliance with Workplace Health and Safety (WHS) legislation, workers' compensation and public liability insurance obligations, and provision of adequate training, equipment, supplies and personal protective equipment to ensure cleaners' safety.</p>			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
3.1	Maintain appropriate certification and insurances.	<ol style="list-style-type: none"> 1. Workplace health and safety and insurance clauses in any contractual arrangement with the Cleaning Contractor, outlining their obligations under this standard. 2. Maintain public liability insurance for the site. 3. Regular meetings (monthly/quarterly) with the Cleaning Contractor and/or regular (monthly) reports to monitor compliance with Standard 3), using the <i>CAF Ongoing Compliance Checklist</i> as a guide. 4. Access to relevant Cleaning Contractor documentation for the purposes of ensuring compliance. 5. Cleaning Contractor documents kept on file, including: <ol style="list-style-type: none"> a. Certificates of insurance b. WH&S policies and compliance records 	<ul style="list-style-type: none"> ● Cleaning contract or other contractual arrangement with the cleaning contractor ● Certificate of public liability insurance ● Record of WH&S related documents requested of the Cleaning Contractor in the past 24 months or since the start of the contract ● Sample of meeting minutes from a standard WH&S compliance check
3.2	Maintain and implement appropriate WHS policies and procedures.		
3.3	Disclose any WorkCover and public liability insurance obligations.		
3.4	Provide employees with adequate materials, equipment and personal protective equipment (PPE) to enable them to safely complete their duties. Ensure systems are in place for cleaners to report low stock, malfunction or breakage of any materials or equipment.		
3.5	Provide ongoing training to employees to ensure they are working safely.		

		<div><div><div>c. Register of training</div><div>d. Evidence of paid attendance of inductions, training, and CAF worker engagement meetings</div><div>e. Policies and systems to prevent and address bullying and harassment of cleaners</div></div><div>After a 3 Star rating has been awarded:<div>6. Monitor ongoing compliance using the <i>CAF Ongoing Compliance Checklist</i>.</div></div></div>	
CAF Resources		External Resources	
CAF Standard 4. Financial viability			
The purpose of this standard is to ensure that cleaners and the Owner/Manager can have confidence in the financial viability of the Cleaning Contractor.			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
4.1	Appropriate financial viability checks are undertaken by the Owner when engaging the Cleaning Contractor at the site and periodically throughout the life of the contract.	<div><div>1. Financial viability disclosure requirements in tender processes.</div><div>2. Credit checks (e.g. through Equifax) are undertaken prior to engaging the Cleaning Contractor to be satisfied of their financial viability.</div><div>3. Review of two years of Cleaning Contractor’s independently audited</div></div>	<div><div>● Detail of financial viability and responsibility disclosure requirements in the tender for this contract</div><div>● Evidence of credit checks carried out prior to engaging the Cleaning Contractor</div><div>● Evidence of request and review of two years of the Cleaning Contractor’s independently audited financial</div></div>
4.2	The Cleaning Contractor’s audited financial statements do not indicate solvency issues.		

		financial statements prior to engagement. 4. Review of any changes in the Cleaning Contractor’s company details in the previous two years, requesting an explanation for any changes. 5. Carry out periodic (e.g. annual) checks to monitor the Cleaning Contractor’s ongoing financial viability.	statements prior to the contract being awarded <ul style="list-style-type: none">● Evidence of inquiry into any changes in company details in the previous two years and any explanation requested regarding those changes● Evidence of periodic checks undertaken since the start of the contract
CAF Resources		External Resources <ul style="list-style-type: none">● Equifax	
CAF Standard 5. Worker engagement 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 Standard.			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
5.1	Cleaners attend a minimum of two CAF meetings each year in paid time.	1. Facilitate a minimum of two annual CAF meetings for all cleaners at the site in paid time. 2. Processes in place to ensure the Cleaning Contractor’s employees attend the worker engagement meetings at the site.	<ul style="list-style-type: none">● Evidence of processes in place to ensure the Cleaning Contractor pays cleaners for specified CAF activities.
5.2	Cleaners are educated and engaged on the CAF Standard and are encouraged to provide feedback on their working conditions without fear of negative consequences.		
5.3	Cleaners at the site nominate one or more CAF Representatives to		

	represent them within CAF and to monitor ongoing compliance with the Standard.	<div><div>3. Fund the annual meetings and the CAF-related worker engagement costs agreed under this Standard.</div><div>4. Timely resolution of any issues identified through the worker engagement process (as per the <i>CAF Remediation Procedure</i>).</div></div> <div>After a 3 Star rating has been awarded:</div> <div><div>5. Review the <i>CAF Compliance Register</i> on a regular basis and consult with the CAF Representative and union to resolve any issues as they arise (as per the <i>CAF Remediation Procedure</i>).</div><div>6. Act in accordance with the <i>CAF Worker Engagement Protocol</i> and the <i>CAF Remediation Procedure</i>.</div></div>	
CAF Resources <ul style="list-style-type: none">CAF Worker Engagement ProtocolCAF Remediation Procedure		External Resources	
CAF Standard 6. Issue identification and remediation			
In line with businesses’ responsibility to remediate labour rights violations that occur in their operations and supply chains, this standard aims to ensure accountability with the CAF Standard throughout the supply chain by ensuring all relevant stakeholders play an active role in investigating and resolving issues both during the certification process and throughout the certification period.			
Standard element		Compliance criteria	Suggested evidence for assessment of compliance
6.1	Participate in good faith in agreed CAF processes to identify, investigate and	<div>1. A clause in any contractual arrangement with the Cleaning Contractor outlining the Cleaning</div>	<ul style="list-style-type: none">Cleaning contract or other contractual arrangement with the cleaning contractor

	remediate any breaches of the CAF Standard.	<p>Contractor's obligations to remediate non-compliance with labour standards.</p> <ol style="list-style-type: none"> 2. Require Cleaning Contractors to participate in agreed processes to identify and resolve any breaches of the CAF Standards. 3. Review and respond to issues reported through the audit and worker engagement process. <p>After a 3 Star rating has been awarded:</p> <ol style="list-style-type: none"> 4. Identification, investigation and remediation of compliance issues that may arise using the <i>CAF Ongoing Compliance Checklist</i> as a guide. 5. Maintain a record of investigation and remediation of compliance issues in the <i>CAF Compliance Register</i>. 	
CAF Resources <ol style="list-style-type: none"> 6. CAF Remediation Procedure 7. CAF Compliance Register 		External Resources	

Benchmarks for retail malls

Oncost	<ul style="list-style-type: none"> • Must be greater than 52% • 'Please explain' for 51-52%
Under cover productivity rate	<ul style="list-style-type: none"> • Must be less than 400 square metres per person per hour (sqm)

	<ul style="list-style-type: none"> • 'Please explain' for 400-450 sqm
Food courts productivity rate (optional)	<ul style="list-style-type: none"> • Recommended less than 200 sqm • 'Please explain' for 200-250 sqm
Bathrooms productivity rate (optional)	<ul style="list-style-type: none"> • Recommended less than 70 sqm • 'Please explain' for 70-80 sqm

Appendix: Job security at change of contract compliance criteria for Cleaning Contractors

<p><u>Outgoing Cleaning Contractor to:</u></p> <ol style="list-style-type: none"> 1. Notify employees as soon as practicable before the existing cleaning contract is due to expire or when the Cleaning Contractor is notified that the contract has been terminated. 2. Hold a site meeting as soon as practicable after receiving notification of contract termination (where possible at least two weeks prior to the contract changing) to: <ul style="list-style-type: none"> • discuss the transition; • provide employees with a letter outlining their entitlements; • obtain a list of employees who wish to stay working at the site; • offer suitable alternative work where possible; and • minute or keep a record of the site meeting. 	<p><u>Incoming Cleaning Contractor to:</u></p> <ol style="list-style-type: none"> 1. Be invited on site to speak to the existing cleaning staff at least two weeks prior to the contract changing. 2. Make an offer of employment in writing to existing direct employees of the outgoing contractor for all available positions at the site.⁵ 3. Ensure adequate records are kept to demonstrate compliance with the requirements. These should include records of transition meetings as well as documentation to substantiate which staff expressed an interest to remain at the site and those that were offered employment.
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⁵ This provision does not preclude the Incoming Cleaning Contractor from actively managing their staff (e.g. through performance management) or from implementing genuine efficiency improvements (e.g. technological innovation) at the change of a contract. Where there is a genuine case for cutting labour due to changes in specifications etc. then evidence should be provided to that effect. Where consultation has not occurred in relation to efficiency improvements and any associated workload safety risks then the efficiency improvements will not be considered genuine. The Incoming Cleaning Contractor shall not be obliged to engage employees who are relocated to the site within one month of the contract change or after the employer receives notice of contract termination (whichever is greater).

<ol style="list-style-type: none"> 3. Provide mandatory redundancy payments to those who do not take up a position with the Incoming Contractor and do not accept an offer of redeployment.⁴ 4. Provide Incoming Cleaning Contractor with a list of employees who want to stay working at the site and consult with the Incoming Cleaning Contractor regarding the change of contract at the site. 5. Ensure adequate records are kept to demonstrate compliance with the requirements. These should include records of transition meetings as well as documentation to substantiate which staff expressed an interest to remain at the site and those that were offered employment. 	
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⁴ See notice of termination and redundancy pay entitlements from the FW Act s117-119.