



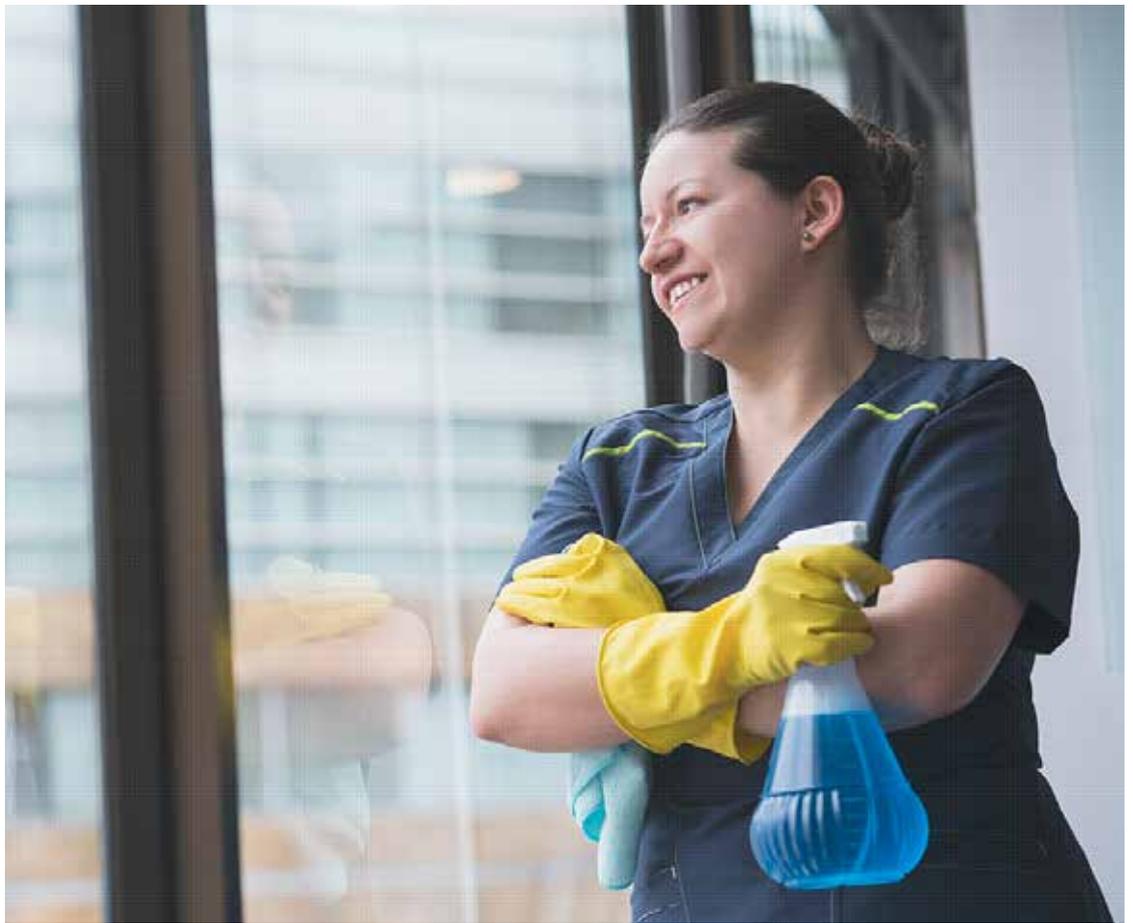
# WHAT IS CAF BUILDING CERTIFICATION?

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## Upholding the rights of cleaners

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**THE WORK CLEANERS DO IS CRITICAL TO ENSURING THE SAFETY AND WELLBEING OF OCCUPANTS IN OFFICE BUILDINGS, SHOPPING CENTRES, SCHOOLS, HOSPITALS, AND UNIVERSITIES AROUND AUSTRALIA.**

Unfortunately, cleaners' essential role in our built environment is frequently overlooked due to the fact that cleaners are an invisible workforce that labours mainly at night, often in isolation. Too often, cleaners' working conditions do not meet community standards for dignified work: stories of underpayment of wages and superannuation, migrant worker exploitation, and even modern slavery have made news headlines for over two decades.

Cleaning has been recognised as a key risk area for modern slavery in Australia by the Department of Home Affairs. Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions are all practices that are found in the cleaning industry in Australia.

These practices start at the point of procurement, with tender processes that encourage undercutting resulting in contracts being awarded at prices that do not allow for payment of minimum wages and entitlements and safe productivity limits, and they continue through opaque and unaccountable supply chain relationships.

CAF exists because our founding partners are committed to upholding cleaners' right to decent work, in other words work that is paid fairly, that is safe, secure, freely chosen, and undertaken with dignity. Consistent with this objective, CAF's partners are committed to responsible business practices, supply chain transparency and accountability and enabling cleaners to speak up.

# About the Cleaning Accountability Framework

**CAF IS AN INDEPENDENT, NOT-FOR-PROFIT MULTI-STAKEHOLDER INITIATIVE THAT SEEKS TO IMPROVE LABOUR STANDARDS IN THE CLEANING INDUSTRY IN AUSTRALIA.**

CAF's partners are industry leaders who seek to ensure that cleaners in Australia are treated fairly and recognised for the important work they do.

CAF's objective is to identify and recognise best practice procurement, employment and compliance approaches in the cleaning industry that support decent work for cleaners and responsible business practices in the property services industry. We do this through the CAF Certification Scheme.

CAF certification was piloted in 13 buildings over a two-year period in 2017 and 2018. CAF certification for commercial office and retail mall buildings was launched in March 2019. CAF has now awarded a 3 Star rating to **20 buildings nationally** and we are continuing to expand into new areas such as retail stores, and work towards developing CAF portfolio certification to ensure high standards across building

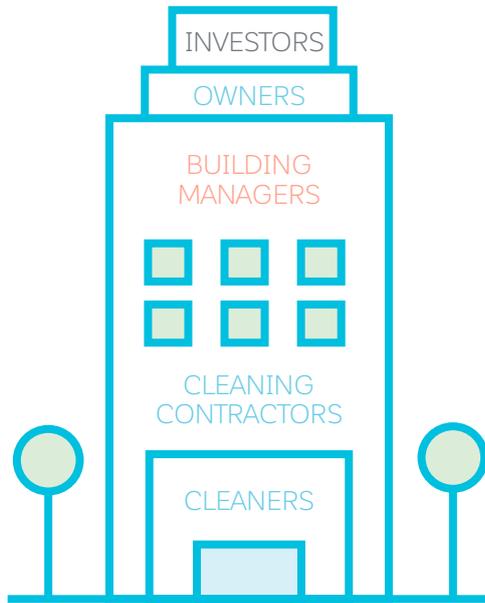


owners' portfolios.

CAF acknowledges that all participants in the property services industry have an active role to play in lifting standards for cleaners. This includes:

- investors and building owners' responsible procurement practices,
- cleaning contractors' compliant employment practices,
- adequacy of building managers' oversight mechanisms, and
- cleaners' ability to speak up when they experience dangerous or substandard working conditions.

## CLEANING SUPPLY CHAIN



For this reason, we work with investors, property owners, building managers, cleaning contractors, and cleaners and their representatives through the CAF building certification scheme.

CAF is at the forefront of innovation to tackle modern slavery risk in Australia. We have a proven track record in uncovering and remediating labour rights violations experienced by cleaners and ensuring that the conditions for decent work are in place in buildings across Australia. CAF's leadership on worker-driven labour standards compliance, robust third-party auditing, and industry-wide collaboration and education is lifting standards for cleaners in Australia and helping companies to protect these important workers in their operations and supply chains from labour rights violations.

CAF works with stakeholders across the cleaning supply chain to implement measures to mitigate modern slavery risk, to improve transparency and accountability in contracting practices, to promote responsible business practices, and to empower cleaners to speak up.

A CAF Star rating on a building provides assurance to investors, building owners and their tenants that cleaning services at that building are being procured, managed, and delivered in a manner that foregrounds respect for cleaners' labour rights.

## What makes CAF different?



**CLEANERS ARE AT THE HEART OF CAF AND OUR CERTIFICATION SCHEME IS WORKER-DRIVEN.**

This means that cleaners are meaningfully involved in the certification process, and remain involved throughout the certification period. Embarking in CAF certification requires the building owner, the building manager, and the cleaning contractor to make space for cleaners to be able to speak up. CAF's unique worker engagement method provides several avenues for cleaners to provide feedback on their working conditions, and to have their say on what needs to change in order for the principles of decent work to be implemented.

# 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 THE SET OF LABOUR STANDARDS TO WHICH CAF CERTIFIES BUILDINGS.**



LABOUR



RESPONSIBLE  
CONTRACTING



WORKER  
ENGAGEMENT



WORKPLACE HEALTH &  
SAFETY



FINANCIAL  
VIABILITY



REMEDATION

The [3 Star Standard](#) is based on existing Australian workplace laws, tax and superannuation laws, and State-based legislation and regulation relating to work health and safety and portable long service leave. The 3 Star Standard is aligned to various international standards including the Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights, GRESB, the Global Reporting Initiative, Ethical Trading Initiative's Base Code, and the UN Global Compact.

[Ready to apply?](#)



# CAF Building Certification overview

Property owners and building managers can nominate buildings for certification. Buildings that have at least 18 months left in the cleaning 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
- undergo a CAF audit
- engage with cleaners in CAF and participate in a social audit
- work with CAF and other stakeholders to implement the CAF 3 Star Standard at a nominated building
- once a building has been certified:
  - sign a *CAF Licensing Agreement*,
  - maintain and demonstrate ongoing compliance with the CAF 3 Star Standard, and
  - support CAF's ongoing research and tool development.

CAF certification will last for the duration of the cleaning contract subject to ongoing compliance with the CAF Standard, the *CAF Terms and Conditions*, and the *CAF Licensing Agreement*.

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

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.

## REMEDIATION

One of the strengths of CAF certification is that it provides a tried and tested roadmap for remediation, which is a central component of the Modern Slavery Act and of the UN Guiding Principles on Business and Human Rights.

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 will work with all relevant stakeholders at the building to address issues raised and will provide advice to implement and maintain compliance with labour standards.

The CAF Remediation Procedure provides a roadmap for ensuring that breaches of the CAF Standard are identified, investigated, and remediated in a timely and transparent manner by relevant stakeholders at the site implementing appropriate corrective action and mechanisms to prevent reoccurrence.

# Benefits of Building Certification

## FOR PROPERTY OWNERS AND INVESTORS, CAF CERTIFICATION:

- ensures that entities in their supply chain are not 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
- is an anti-slavery mechanism which can be included in Modern Slavery Act statements; and
- reduces the risk of being involved in a contravention of workplace laws through accessory liability provisions under section 550 of the Fair Work Act.

## FOR CLEANERS, CAF:

- helps drive compliance with labour standards in their workplace;
- amplifies their voice in the workplace and in the supply chain; and
- provides access to remedy.

## **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 the accessory 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;
- is an anti-slavery mechanism which can be included in Modern Slavery Act statements; and
- demonstrates ethical sourcing strategies and company due diligence over indirect supply chains.

# Steps to Building Certification

## **1. APPLICATION FOR CERTIFICATION**

CAF welcomes expressions of interest for building certification on a rolling basis. The property owner/building manager nominates a building by completing the [application form and self-assessment questionnaire](#). CAF will then liaise with applicants of buildings regarding the timing of the assessment (desk-based audit and worker verification).

## **2. STAKEHOLDER MEETING**

CAF will arrange an initial meeting with all supply chain stakeholders including the property owner, building manager, cleaning contractor and United Workers Union two weeks before the assessment is due to commence.

## **3. AUDIT**

CAF will appoint an auditor to assess cleaners' employment records and conduct the supply chain audit against the [CAF 3 Star Standard](#). The auditor will deliver a report outlining their findings to CAF for consideration by the CAF Certification Panel.

CAF will assess the [pricing schedule](#) for the building to verify whether the cleaning contract is sustainably priced in a manner that enables the payment of cleaners' wages and entitlements and allows for safe productivity limits.

#### 4. WORKER ENGAGEMENT



At the same time as the desk-based audit takes place, CAF undertakes worker engagement with cleaners at the building.

CAF will organise two worker engagement meetings for cleaners in paid time, and invite them to complete a survey about their working conditions. All supply chain stakeholders are invited to the first meeting, while the second meeting takes place between only the cleaners, CAF and United Workers Union, to ensure cleaners have the opportunity to speak up without fear of retribution.

CAF, in consultation with United Workers Union, will prepare a report outlining the findings from the worker engagement process, and requesting appropriate investigation and remediation to be implemented.

CAF's worker engagement processes and remediation processes are codified in the *CAF Worker Engagement Protocol* and the *CAF Remediation Procedure* which have been devised in consultation with stakeholders from government, academia, business, and the cleaning workforce and their union, on the basis of tripartite cooperation to protect, respect and remedy worker's human rights in the context of labour supply chains.

Through the worker engagement process, there is a high likelihood that issues will be raised by cleaners that may require further investigation. Depending on the classification of any issues reported by cleaners CAF will liaise with relevant stakeholders to ensure that appropriate investigation and remediation occurs in a manner that protects cleaners' anonymity and mitigates the risk of negative repercussions for speaking up. The *CAF Remediation Procedure* outlines the processes to be followed by CAF and by relevant supply chain stakeholders and is based on best-practice methods to provide:

- assurance of remediation,
- access to justice for cleaners,
- improvements to employment practices, and
- other proactive risk mitigation strategies to ensure that labour rights violations reported by workers are addressed in a manner that promotes sustainable compliance, and supply chain transparency and accountability.

As part of the worker engagement process undertaken during the application for certification, cleaners nominate a CAF Representative. A CAF Representative is a cleaner who other cleaners feel best represents their interests, and with whom they feel comfortable raising issues.

## **5. 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.

## **6. CERTIFICATION**

Once a 3 Star CAF rating has been awarded, 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.

## **7. ONGOING COMPLIANCE**

In order to maintain certification, stakeholders must demonstrate ongoing compliance over the 3 year certification period and will have access to a range of tools and training in order to achieve this. This will help to ensure that compliance is not simply determined at a moment in time but is sustainable and verifiable throughout the certification period. CAF's ongoing compliance mechanisms also ensure that there are clear processes in place that allow stakeholders to raise and address any issues that impact on cleaners' labour rights that may arise during the certification period.

CAF conducts annual health checks after the first and second year of certification, reprising the worker engagement process and seeking evidence of implementation of CAF recommendations.

The CAF Representative receives training and support to fulfil their function, and provides an ongoing feedback loop on compliance throughout the certification period.

CAF's ongoing compliance and annual health check processes ensure that CAF certification provides a much higher level of assurance of sustainable compliance than a point in time audit.

# CAF Certification Methodology and Certification Panel Governance

## CAF'S APPROACH TO ASSESSING BUILDINGS AND CONTRACTORS IS BASED ON VERIFYING THAT THE REQUIREMENTS OF THE APPLICABLE CAF STANDARD ARE MET.

Where the requirements are not met, CAF provides guidance to implement the CAF Standard and to ensure ongoing compliance.

CAF and its stakeholders are guided by the [CAF Core Principles](#). To maintain integrity throughout the audit process, CAF:

- 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;
- 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, which is multi-stakeholder in nature and ensures that relevant perspectives in the industry are represented. The role of the Panel is to consider assessment reports and on this basis decide whether a building should be awarded a CAF 3 Star rating, or a cleaning contractor should be CAF prequalified.

**IF YOU WOULD LIKE TO NOMINATE A BUILDING FOR CAF CERTIFICATION  
[APPLY NOW](#) OR EMAIL [INFO@CLEANINGACCOUNTABILITY.ORG.AU](mailto:INFO@CLEANINGACCOUNTABILITY.ORG.AU) FOR MORE  
INFO.**