



CLEANING
ACCOUNTABILITY
FRAMEWORK

USER GUIDE

CAF BUILDING CERTIFICATION

CAF building certification – user guide

This document 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 this document will be considered a breach of the [CAF Terms and Conditions](#) and may result in removal of CAF certification or membership. Further distribution of this document will be at the sole discretion of CAF, and any requests should be made in writing to the CAF Secretariat (info@cleaningaccountability.org.au)

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Introduction

This document is your guide to the CAF building certification process. It contains information on the certification process, ongoing compliance and annual health checks. It also contains the following key documents that describe the practices for multi-stakeholder collaboration which are at the heart of CAF and the building certification scheme:

- The *CAF Worker Engagement Protocol*, where information about the worker engagement meetings and the CAF Representative etc. can be found;
- The *CAF Remediation Procedure*, which details the processes to be followed when compliance issues are raised;
- *CAF Certification Methodology*, and
- *CAF Certification Panel Governance*

Steps to Building Certification

1. Application for Certification

The property owner/building manager/tenant nominates a building by completing the [CAF Building Certification Application Form](#) and self-assessment questionnaire on our website. CAF will then liaise with applicants of buildings regarding the timing of the audit.

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 Workers Union 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 will be confirmed.¹

¹ See [CAF Worker Engagement Protocol](#) for detailed guidance.

4. Audit

CAF will appoint an independent auditor to conduct the desk-based CAF audit. Stakeholders at the building will receive a document request list one week prior to the audit commencement date.

All documents must be submitted to the auditor by the communicated due date. Late submission of documents may impede adequate assessment of compliance and may result in follow-up audit costs for the applicant. 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 applicant must appoint an individual to coordinate stakeholders’ participation in the audit to ensure that documentation is submitted within the prescribed timeframes.

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

The audit process is outlined in the following table (table to be read in conjunction with the audit document request list provided to audit participants one week prior to commencement of audit):

Step	Activity	Timing
1	<p>CAF introduces the auditor to stakeholders at the building one week before commencement of the desk-based audit.</p> <p>The auditor issues document request list.</p> <p>The cleaning contractor is to prepare the following documents for submission on day 1 of the audit start date:</p> <ol style="list-style-type: none"> 1. Employee listing in Excel, including: <ol style="list-style-type: none"> a) employee names and employee numbers, b) visa status by employee (note if the employee has restricted working hours), c) employment type (casual, permanent part-time, permanent full-time, fixed term part-time or full-time), d) employee classification level, e) employment start date, f) ordinary hours per day, g) ordinary hours per fortnight h) ordinary shift start and end time i) note whether any IFA or Second Engagement in place for relevant workers 	<p>1 week prior to commencement of audit period – Audit preparation</p>

	<ol style="list-style-type: none"> 2. Pay periods in Excel from the past 24 months or since the start of the contract, whichever is shorter. 3. Subcontractor listing, if applicable 4. Confirmation of applicable Award/Agreement, 5. Copy of any applicable enterprise bargaining agreement. <p>In the week prior to commencement, a representative from the applicant organisation (typically the Owner or Manager) is to coordinate with the other stakeholder(s) (namely the cleaning contractor) to ensure the timely submission of documentation.</p> <p>One business day prior to the audit start date, the auditor will issue instructions for submission of information.</p>	
2	<p>The employee listing, the pay periods, the subcontractor listing, and a copy of the EBA (if applicable), are to be submitted on day 1 of week 1.</p> <p>The auditor will select a sample of employee records for testing <u>within two business days</u>.</p> <p>The list of employee records to be submitted for each of the employees and pay periods selected by the auditor are as follows:</p> <ol style="list-style-type: none"> 1. Employment contract / letter of engagement 2. Attendance over selected pay periods 3. Pay slips for selected pay periods 4. Wage calculation process: <ol style="list-style-type: none"> a. Ordinary hour b. Overtime hours (including Saturday, Sunday and Public Holiday) c. Allowances: Shifts, leading hand, toilet, and broken shift, etc. <p>The cleaning contractor is to submit the above employee records for the selected employees and pay periods <u>by end of week 1</u>.</p>	Week 1
3	<p>All other documents (see document request list) are to be submitted by mid-way through week 2.</p> <p>Auditor to notify CAF mid-way through week 2 of any outstanding items, so CAF can follow up with the applicant.</p> <p>Any document still outstanding by the end of week 2 will be classified as 'not provided' thereby impeding assessment of</p>	Week 2

	compliance, and may result in the imposition of additional audit costs.	
4	<p>Analysis and report writing.</p> <p>During week 3, participants are to respond to any requests for clarification/information by auditor within one business day.</p> <p>Draft findings report delivered to CAF at end of week 4.</p>	Weeks 3 & 4
5	CAF feedback provided to auditor	By end of week 5
6	Auditor issues final report to CAF	By end of week 6

5. Worker Engagement Meetings

CAF will liaise with the property owner, building manager, cleaning contractor and United Workers Union to undertake a minimum of two worker engagement meetings (30 minutes each). CAF and United Workers Union 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.

CAF will provide a letter of recommendation based on the Certification Panel’s decision to all stakeholders involved in the building’s certification, outlining any steps that may be required to be taken pre- and post-certification to implement the CAF 3 Star Standard. Stakeholders will also receive copies of the audit report and worker engagement report, as well as any material relevant to investigations conducted about particular issues that may

have been identified at the site (including investigation reports by the cleaning contractor and the union).

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

For more information about the assessment process see the [CAF Certification 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 promote certification of the building and will liaise with the applicant's marketing and communications team to this end.

In order to maintain certification, stakeholders must demonstrate ongoing compliance throughout the validity of the certification (as detailed in the next section). This includes any recommendations issued by the CAF Certification Panel that may be required to be implemented after certification has been awarded. 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.

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 compliance register into which stakeholders will be able to report issues identified and describe their investigation and remediation. CAF will also provide an ongoing compliance checklist for the building, to facilitate and document regular compliance checks between the building manager and the cleaning contractor. The CAF Representative (a cleaner nominated by their peers to represent the workforce) will also be involved in ongoing compliance, including through quarterly check-ins with the building manager.

CAF Annual Health Check

Every 12 months after a building has been awarded a 3 Star rating, CAF undertakes an annual health check (AHC). This is to verify that the 3 Star Standard is continuing to be met at the site.

- 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
 - request evidence that outstanding requirements have been implemented.
- 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 (15 and 45 minutes each) as per the [CAF Worker Engagement Protocol](#). Following the worker engagement meetings, CAF will work together with United Workers Union and/or the CAF Representative to draft a report on the outcome of the meetings.
- 4) Based on the information in the previous auditor's report, evidence of regular compliance check-ins with the cleaning contractor by the property owner/building manager, evidence of quarterly check-ins with the CAF Representative(s), 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.

Duration of certification

For sites that were certified as part of the pilot phase, certification lasts for 3 years or until
For sites that go through certification after May 2019, certification will commensurate with the duration of the cleaning contract. Where there is a change of contract, but the incumbent retains the contract, certification will continue and only a check of the Pricing Schedule will be required. Where the contractor changes, certification will be maintained for 6 months to allow for another audit to take place.

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 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](#).

Appendix A: CAF Worker Engagement Protocol

Purpose

The purpose of the CAF Worker Engagement Protocol is to outline the principles and practices that guide the role of workers and their representatives in verifying that a site meets the CAF Star Standard.

Cleaners are essential to the CAF rating process, and this Protocol clarifies the role of all stakeholders - owners, facility/building managers, contractors, cleaners, United Workers Union (UWU) and CAF-specific to worker engagement at a CAF site.

While agreeing to work together cooperatively through the CAF Worker Engagement Protocol, 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 owners, facility/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.

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) Freedom of association – CAF recognises that worker voice is essential to empower cleaners to access their due rights and conditions. Australia is signatory to the International Labour Organisation’s [Core Conventions](#) which include freedom of association and the right to organise, among others. The CAF Standard requires stakeholders to demonstrate practically their adherence to these principles.

United Workers Union, as the union representing cleaners with established workplace knowledge, will play an important role in the worker engagement element of CAF. In fulfilling this role, United Workers Union will follow the principles and practices established in this protocol. In particular, United Workers Union 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 Workers Union 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 Workers Union must use formal Right of Entry powers to seek access to a workplace for the purposes of carrying out discussions with potential members.

- c) Independence and 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 Workers Union representatives and/or CAF workplace representatives without other parties present.

- d) Confidentiality – All information collected by CAF or United Workers Union through engagement with workers as part of CAF certification will only be used for CAF purposes. Where worker or member information is collected by United Workers Union as part of its ordinary business, the usual restrictions and obligations under the Privacy Act and Fair Work (Registered Organisations) Act will apply.

See CAF's Privacy Policy for more information:

<https://www.cleaningaccountability.org.au/privacy-policy/>.

- e) Evidence-based – The CAF rating 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).

- f) Scope – In engaging workers as per this Protocol, CAF and United Workers Union will operate within the scope of CAF standards for the purposes of CAF certification.

Practices

Pre-meeting preparation

Prior to attending the CAF meeting, cleaners (including employees of subcontractors) will be provided with 15 minutes as part of their shift to watch the CAF video and complete the CAF survey.

Annual site meetings

As part of the CAF rating process, annual meetings will be held with the cleaning workforce (including subcontractors and employees of subcontractors) at the site. Cleaners will be paid for their attendance.

These meetings are held with CAF and United Workers Union, without employer representatives or building management representatives present. This is in recognition of the fact that cleaners are widely recognised as a vulnerable workforce and are may be reticent to speak about their working conditions in front of management. CAF recognises the importance of creating a safe space for cleaners to raise issues, therefore this meeting provides an opportunity for cleaners to speak to independent third parties without employer representatives.

	Duration	Stakeholders involved	Purpose
Application	Pre-meeting preparation (15 minutes)	<ul style="list-style-type: none"> ○ Cleaners 	<p>CAF video: Introduce CAF and the 3 Star Standard, and the involvement of the cleaning contractor, building manager and owner, and explain the role of cleaners in the process.</p> <p>Survey: Cleaners complete the CAF survey</p> <p>Cleaners watch the video and complete the survey during their shift in the 2 weeks preceding the CAF meeting. Cleaning contractors provide each employee with 15 minutes as part of their shift to do so; and request that subcontractors do the same.</p>
	Meeting (45 minutes)	<ul style="list-style-type: none"> ○ Cleaners ○ United Workers Union ○ CAF 	<p>Follow up on CAF survey findings and issue identification.</p> <p>Education about labour rights.</p> <p>CAF Rep nomination process.</p> <p>Opportunity for cleaners to join their union.²</p>

² With prior consent of cleaning contractor. This does not restrict existing [legislative provisions](#) regarding a union’s right to enter a workplace.

Annual Health Check	Pre-meeting preparation (15 minutes)	<ul style="list-style-type: none"> ○ Cleaners 	<p>CAF video: Introduce CAF and the 3 Star Standard, and the involvement of the cleaning contractor, building manager and owner, and explain the role of cleaners in the process.</p> <p>Survey: Cleaners complete the CAF survey</p> <p>Cleaners watch the video and complete the survey during their shift in the 2 weeks preceding the CAF meeting. Cleaning contractors provide each employee with 15 minutes as part of their shift to do so; and request that subcontractors do the same.</p>
	Meeting (45 minutes)	<ul style="list-style-type: none"> ○ Cleaners ○ CAF ○ UWU 	<p>Follow up on CAF survey findings and issue identification. Education about labour rights.</p> <p>CAF Rep nomination process (if no CAF Rep exists on site).</p> <p>Opportunity for cleaners to join their union.³</p>

The meetings will be arranged at an agreed time(s) and location in accordance with the site’s building manager, cleaning contractor and United Workers Union. The cleaning contractor will communicate the meeting details to staff by forwarding the CAF meeting invitation to the cleaning workforce and will provide a copy of the invitation and list of invitees to CAF.

As per the CAF 3 Star Standard, the cleaning contractor, owner and facility/building manager must ensure that all cleaners are able to participate in these meetings (minimum 90% of all cleaners employed at the building for commercial sites; and minimum 80% of cleaners

³ With prior consent of cleaning contractor. This does not restrict existing [legislative provisions](#) regarding a union’s right to enter a workplace.

rostered to work that day for retail sites). This will require additional resources either in the form of extra staff or extra hours (see note on Costs).

Wherever possible, the meetings should take place as part of cleaners' shifts. It may be necessary to hold more than one meeting to accommodate all cleaners, especially where there is a large workforce or multiple shift times. CAF will liaise with the cleaning contractor to hold the meetings at a time that will capture as many cleaners as possible.

Important note: *It is expected that where the meetings take place during the cleaners' shift, additional casual staff/hours are provided so there is not an increase in workload. Where meetings are held outside of cleaners' ordinary hours of work, it is the cleaning contractor's responsibility to ensure that cleaners with visa-restricted working hours (e.g. international students) are not made to breach their visa conditions.*

Important note: *Where a cleaner's shift occurs outside of the time of a CAF meeting and they wish to attend, the cleaner's attendance should be paid and minimum engagement provisions will apply. For example, if a cleaner is not rostered on the day of the CAF meeting, and they wish to attend, they must be paid the full 4 hours (unless other minimum engagement provisions apply) for attending the meeting. The cleaning contractor may provide cleaning tasks for the cleaner to complete as part of the shift.*

Who pays for the worker engagement meetings: The cost (extra staff or hours) of holding CAF worker engagement meetings will be covered by the property owner/manager (same if it is a tenant-led application) – cleaners will subsequently be paid by their employer to attend the meetings. Payment for cleaners' attendance at CAF meetings must occur within two pay cycles from the date of the meetings. CAF recommends that the cleaning contractor invoice the owner/manager for the worker engagement meeting on an annual basis beginning at the time the first meetings are held, and then at each annual health check.

CAF Representatives

A CAF Representative is a cleaner who other cleaners feel best represents their interests, and who they feel comfortable raising issues with. CAF's Star rating process aims to go beyond a point-in-time audit, providing ongoing assurance of labour standards compliance at a site. The CAF Representative is critical to this objective as they will be equipped to raise issues in a timely manner, thereby contributing to the maintenance of good working conditions for cleaners at the building, reducing legal and reputational risks associated with non-compliance.

The CAF Representative will be nominated by their peers at a CAF meeting and cannot be a supervisor, manager, or administration staff.

Duties

1. The CAF Representative will be given regular opportunities to meet with new starters to educate them about CAF and the Star Standard. 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 site and explain what this means; and
- explain how the CAF standards must be monitored by workers.

2. The CAF Representative will be required to engage with other cleaners on an ad-hoc basis to determine if the CAF 3 Star Standard is being maintained.

3. The CAF Representative will meet quarterly with the facility/building manager to provide an update on their observations and interactions with cleaners at the site.

4. The CAF Representative, together with supply chain stakeholders at a site, will provide a report to CAF as part of the annual health check process.

CAF Representative training, recognition and ongoing support

CAF Representatives will rely on the support of United Workers Union as the best placed stakeholder to provide leadership, representation and advocacy skills training and support.

United Workers Union will offer training for CAF Representatives. The purpose of this training will be to:

- Educate them on the CAF Star Standard and how to monitor this;
- Provide the representatives with training material and material relevant to their site to enable them to monitor labour standards;
- Develop their conversation and representation skills, especially how to communicate with other cleaners about CAF;
- Explain how to respond to compliance issues at their site; and
- Provide them with any other information that they need to perform their role.

The employer of the CAF Representative will pay their employee for all time spent at training with each training session to be paid as ordinary work hours for that day. There will be a maximum of two training sessions per CAF Representative per year.⁴

⁴ If additional training is required, this will happen with the prior consent of the employer.

CAF Representative Allowance

The CAF Representative will receive an allowance to compensate them for performing additional CAF duties and to provide recognition of their role to represent and advocate on behalf of their colleagues. The cost will be covered by the owner (see [note on Costs](#)).

The CAF Representative Allowance is based on the leading hand allowance in the Cleaning Services Award. It is an hourly rate as opposed to a flat site allowance and is based on the number of cleaners the CAF Representative is supporting and representing.

The CAF Representative Allowance hourly rates for July 2020 – June 2021 are set out below:

CAF Representative Allowance - 1 to 10 employees	\$1.27 per hour, up to a maximum of \$48.29 per week
CAF Representative Allowance - 11 to 20 employees	\$1.64 per hour, up to a maximum of \$62.14 per week
CAF Representative Allowance - over 20 employees	\$2.00 per hour, up to a maximum of \$75.98 per week

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

- 1 to 10 employees: \$25.40 per week
- 11 to 20 employees: \$32.80 per week
- 20+ employees: \$40.00 per week

For the purpose 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.⁵

Ongoing site visits

United Workers Union may visit CAF buildings to support CAF Representatives and cleaners in the implementation and monitoring of the CAF Standard. As per this protocol and existing right of entry provisions, 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 other stakeholders, including the facility/building manager, to ensure that the worker engagement element of the CAF Star Standard is being implemented. The ongoing site visits are designed to assist sites to maintain their CAF certification.

⁵ 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.

Summary of the costs of worker engagement activities

Activity/element	Stakeholder responsible for the cost	Detail
Worker engagement meetings (extra staff or hours)	Building owner	Cleaners will be paid by their employer to attend the meetings, and their employer will obtain reimbursement from the building owner/manager. Payment for cleaners' attendance at CAF meetings must occur within two pay cycles from the date of the meeting.
CAF Representative allowance	Building owner	Cleaners should be paid the allowance by their employer from the date on which acceptance of the role is signed by the CAF Representative and their employer and forwarded to CAF. CAF recommends that the cleaning contractor invoice the owner for the above-mentioned costs on an annual basis at the time of the annual health check, or on a monthly/quarterly basis for the CAF Representative allowance.
CAF Representative training	Cleaning contractor	Paid time release for training. Replacement staff may be needed for this purpose.

Appendix B: CAF Certification Methodology

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.

CAF and its stakeholders are guided by the CAF Core Principles. To maintain integrity of the audit process, CAF:

- 1) will be guided only by evidence, as opposed to promises of compliance;
- 2) may prevent certification being awarded until any identified issues of legal non-compliance have been fully rectified;
- 3) may prevent certification being awarded until any identified issues of non-compliance with oversight processes have been addressed and/or rectified;
- 4) considers the worker engagement component of the CAF Standard core to the integrity of the scheme and as such a compulsory requirement; and
- 5) 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) For issues that have been identified at any site through previous CAF audits, the CAF Secretariat will suggest appropriate remediation in line with previous recommendations.
- 2) For issues that have not been identified through previous CAF audits, or where an issue is considered to be particularly complex or severe, 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.
- 3) 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.
- 4) Where an applicant has successfully achieved certification for a site, CAF will provide a certificate attesting to this fact.
- 5) Where an applicant has failed to achieve certification in the first instance, CAF will provide recommendations and assistance on how to proceed.

Timelines for remediation are set based on the severity and complexity of the issue.

Where an entity disagrees with the decision of the CAF Certification Panel, they will have recourse to a dispute resolution procedure (found in the *CAF Terms and Conditions*).

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.

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 should be awarded a CAF 3 Star rating, or a cleaning contractor should be CAF prequalified. The Panel will also act as the forum for raising and considering any disputes related to CAF certification and prequalification, as per the *CAF Dispute Resolution Procedure* (found in the CAF [Terms and Conditions](#)).

Responsibilities

The Panel is responsible for:

- 1) Reviewing the audit report provided by the independent auditor/assessor, the worker engagement report provided by CAF and United Workers Union, and any other relevant information provided by participating parties;
- 2) On the basis of the above, determining follow up actions required to address any non-compliance, or deciding whether a building or cleaning contractor meet the nominated CAF Standard;
- 3) On an ad-hoc basis, determine whether a building or contractor continues to meet the CAF Standard (e.g. where a non-compliance has been identified);
- 4) Manage disputes in accordance with the *CAF Dispute Resolution Procedure*;
- 5) Declare and manage any conflicts of interest in accordance with CAF's *Conflict of Interest Policy*;
- 6) Make a decision where a case is made for revocation of certification/prequalification; and
- 7) Report to the CAF Steering Committee at its meetings. Reports will include:
 - a. the number and types of certifications and prequalifications issued;
 - b. the number and types of certification applications received;
 - c. the number of disputes and revocations; and
 - d. any identified non-compliance issue that impacts the credibility of the CAF Rating Scheme or organisation.

Certification Review

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

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

After considering the audit report and worker engagement report (and any other relevant materials), the Panel will have 14 business days to issue a letter outlining its findings to all participants. The Panel reserves the right to revoke certification/prequalification in accordance with the *CAF Terms and Conditions*.

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 and will be multi-stakeholder in nature to reflect the composition of CAF as an organisation. The Panel will comprise:

- Chairperson
 - Chair of the CAF Steering Committee
- Members
 - CAF Secretariat (non-voting)
 - United Workers Union representative
 - University of Technology Sydney representative
 - Fair Work Ombudsman representative (non-voting)
 - Business/employer 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 and with at least 10 business days' notice.

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 (CRP)

Purpose of the CRP

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 CAF 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 remediated 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 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 Workers Union, 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 Workers Union

As a registered organisation and the union for cleaners, United Workers Union 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 Workers Union, 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 Workers Union 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 Workers Union 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 Workers Union.

CAF will complete the worker engagement report with all the issues raised by cleaners in the worker engagement process, in consultation with United Workers Union, 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 Workers Union 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 Workers Union.

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 Workers Union, 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 United Workers Union, 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 Workers Union.

2. During the annual health check

2.1 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.

2.2 Major, serious or minor issues

This is the process to follow for major, serious, or minor issues.

When cleaners raise major, serious or minor issues, CAF will notify the Cleaning Contractor as soon as practicable after the second worker engagement meeting, outlining the issue(s) reported and requesting acknowledgement of receipt within 48 hours and an investigation within 10 business days. The investigation must be credible and may require the involvement of United Workers Union to guarantee independence of findings.

- If the investigation 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 or collaborative action with United Workers Union.
- 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 immediate implementation of 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 Workers Union.

CAF will complete the annual health check report with all the issues raised by cleaners in the worker engagement process, in consultation with United Workers Union, detailing:

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

Escalation procedure

In the event that a cleaning contractor does not follow the above process, CAF will escalate the matter to the building manager and/or owner.

This may occur for example when the cleaning contractor:

- Fails to meet specified timelines for investigation and remediation;
- Is unresponsive to CAF or United Workers Union requests;
- Does not complete the investigation and/or remediation process to a satisfactory standard; and/or
- Takes retaliatory action against cleaners for speaking up.

Following escalation, if the building fails to meet the requirements to retain CAF certification, the matter will be referred to the CAF Certification Panel. The Panel will review the reports and any other supporting documentation and determine:

- a) Next steps to assist the building to retain certification
- b) Whether to revoke CAF Certification
- c) If the building meets the CAF Standard and should remain certified

The decision of the Panel will be communicated to the owner and/or manager and will be final.⁶

Submission of the worker engagement report to the building owner/manager or tenant

Once the annual health check is completed and the site is deemed compliant with the CAF Standard, CAF will submit the annual health check report to the building owner, manager and tenant if applicable, along with stakeholders' documentation and evidence relating to any investigation and remediation of the major and serious issues reported.

3. Issues that are raised on an ad-hoc basis

From time to time, issues may arise that need to be dealt with prior to the annual health check. These are critical, major or serious issues which pose an immediate risk to cleaners' safety and wellbeing. These issues may be raised by any stakeholder in the supply chain, United Workers Union, CAF or statutory authorities such as the Fair Work Ombudsman.

3.1 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.

3.2 Major or serious issues

This is the process to follow for **major or serious issues**, where cleaners' safety and wellbeing may be at immediate risk and an investigation and remediation is urgent.

When cleaners or another stakeholder raise major or serious issues, CAF and/or United Workers Union will notify the Cleaning Contractor as soon as practicable, outlining the issue(s) reported and requesting acknowledgement of receipt within 48 hours and an investigation within 10 business days. The investigation must be credible and may require the involvement of United Workers Union to guarantee independence of findings.

- If the investigation 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 or collaborative action with United Workers Union.
- 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 immediate implementation of 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 Workers Union.

⁶ The applicant will still have recourse to the Dispute Resolution Procedure as per the [CAF Terms and Conditions](#).

Reporting and recording

CAF will update the compliance register with any major or serious issues raised in consultation with United Workers Union, 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 communicate this to the rest of the supply chain.

Escalation procedure

In the event that a cleaning contractor does not follow the above process, CAF will escalate the matter to the building manager and/or owner.

This may occur for example when the cleaning contractor:

- Fails to meet specified timelines for investigation and remediation;
- Is unresponsive to CAF's or United Workers Union's requests;
- Does not complete the investigation and/or remediation process to a satisfactory standard; and/or
- Takes retaliatory action against cleaners for speaking up.

Following escalation, if the building fails to meet the requirements to retain CAF certification, the matter will be referred to the CAF Certification Panel. The Panel will review the reports and any other supporting documentation and determine:

- a) Next steps to assist the building retain certification
- b) Whether to revoke CAF Certification
- c) If the building meets the CAF Standard and should remain certified

The decision of the Panel will be communicated to the owner and/or manager and will be final.⁷

3.3 Minor issues

Minor issues will be investigated and remediated collaboratively at the site level through consultation between relevant stakeholders including the CAF Representative, United Workers Union, the Cleaning Contractor and the Building Manager. The Building Manager is to retain a record of minor issues reported at the site, including their investigation and remediation. The CAF Compliance Register can be used for this purpose. The resolution of minor issues will be checked by CAF at the next annual health check.

In the event that minor issues have been reported to the relevant stakeholder and no action to investigate and remediate is taken within a reasonable timeframe, this can be escalated to CAF by any stakeholder.

⁷ The applicant will still have recourse to the Dispute Resolution Procedure as per the [CAF Terms and Conditions](#).

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 further investigation by CAF stakeholders and a remediation plan.	<p>Examples</p> <ul style="list-style-type: none"> • Cleaners report high workloads or working unpaid overtime • Cleaners are underpaid • 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>Impact</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	<p>Examples</p> <ul style="list-style-type: none"> • Insufficient evidence to demonstrate compliance with the CAF Standard • Cleaners not receiving information sheets during induction

	investigated and readily resolved.	<ul style="list-style-type: none"> • 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