

Labour Standards Assurance System Policy

Aim & Objectives

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards and to motivate suppliers to comply with them. This standard will be required from all potential suppliers in future. To support this aim H&R Healthcare has developed the following Labour Standards objectives.

Scope

This policy applies to the devices supplied to the UK National Health Service (NHS). The Labour Standards Assurance System (LSAS) is driven by H&R Healthcare's Director. The responsibilities of the Operations Director and the nominated team are to:

- Develop procedures to meet policy requirements.
- Communicate labour standards issues to the senior management team.
- Liaise with the supply chain to undertake labour standards status reviews.
- Systematically review and continually improve the LSAS.
- Implement training for staff involved with LSAS.
- Ensure procedures in place to monitor and measure performance.

Roles and Responsibilities

The Operations Director shall liaise with the Director to develop the LSAS and present developments to the senior management team at appropriate intervals at Management Review.

As an employee of H&R Healthcare, if you suspect something is not being done in accordance with this policy, you can report this. Use the email address: speakup@hrhealthcare.co.uk. Emails sent to this address will be directed to the HR Generalist and will be treated anonymously (if desired). Complaints may be made without the risk of steps being taken against the employee who reports the complaint. H&R Healthcare will immediately and carefully investigate any violations brought to its attention.

Legal Requirements

H&R Healthcare is committed to remain up to date with changes to relevant employment legislation through its HR department.

Relevant employment legislation with regards to H&R Healthcare direct operations is outlined in the employee contracts and staff handbook issued to all employees.

Risk Management

As part of our LSAS we will evaluate new suppliers before entering into agreements with them and review existing suppliers periodically. We will do this within our Quality Risk Management System and risk analysis method. Any suppliers identified as high risk will be required to adhere to our modern slavery policies as a contract condition and will be trained on the relevant modern slavery policies.

Objectives, Targets and Programmes

H&R Healthcare is committed to developing a Corrective Action Plan (CAP) following each Labour Standards Status review. CAP's are reviewed by senior management, in line with the requirements documented in the Quality Manual, to determine whether the company is on target to reach their objectives and ensure these objectives are still appropriate. This activity also ensures that all relevant personnel are kept up to date with the development of the LSAS programme.

Competence, Training & Awareness

H&R Healthcare is committed to the training of all staff to be aware of employment laws and ethical labour standards. Staff in roles identified as having influence on labour standards assurance will be:

- Competent in the H&R Healthcare Code of Conduct and the LSAS requirements.
- Authorised to contact suppliers and build relationships with them.

Communications

The LSAS is embedded in the Quality Management System. H&R Healthcare records and monitors complaints, allegations or alerts relating to LSAS.

Operational Control

For the direct operation of the company, the Quality Management System documents the procedures involved with controlling the labour standards of the company and addressing any risks or breaches of this policy that may be posed. It is the responsibility of the Operations Director to ensure that the current applicable labour standards are being referenced.

Critical Control Points

Critical Control Points (CCP) and the method of control are detailed within our QMS and embedded within our standard procedures.

Supply Chain Management

H&R Healthcare is committed to monitoring and maintaining the labour standards in the company's supply chain through the distribution and communication of the company's Supplier Code of Conduct.

New Tier 1 suppliers must meet initial approval criteria which outline the standards the supplier is expected to maintain as part of their contract. These standards comply fully with those required by the LSAS.

Emergency/Critical Issue Response

Upon engagement suppliers must fulfil the requirements of our Supplier Code of Conduct. Suppliers will be re-assessed periodically and failure to comply with LSAS, as agreed within our Supplier Code of Conduct, will be considered a critical issue.

Emergency response comprises a request for written Corrective Action Plan (CAP) that is approved by all parties involved. Should this CAP be deemed unacceptable then the process of securing an alternative supplier of the product shall be implemented within a reasonable period from the initial breach of the company's Ethical Trading Policy. (*refer to SOP027*)

Policy (POL)

Number: POL005 V3.0
Cancels: POL005 V2.0
Date of issue: 25/09/20

Management Review

The LSAS programme and progress against LSAS objectives is formally reviewed by the Senior Management Team during the Annual Management Review Meeting.

This document is to be read in conjunction with POL006 Supplier Code of Conduct.

H&R Healthcare also request that suppliers share this policy and our Supplier Code of Conduct with companies within their supply chain.