1.1 Labour Management System

Introduction

Labour is the overall term used to describe the workers in your business that help deliver the products and/or services your business offers. Workers may be hired directly or provided by agencies, work at your site or remotely at different sites, in vehicles (mobile workers) or at home (homeworkers).

In this guidance, labour management refers to the expectation for companies to operate in compliance with legal and customer requirements for providing their workers with fair, safe and humane working conditions.

Besides local law, the key standards your customers require their suppliers to follow for treatment of workers are:

- **The United Nations Guiding Principles on Business and Human Rights (UNGPs)** explains the activities businesses must do to respect human rights in their own operations and in their supply chain.

- **The International Labour Organisation (ILO) conventions** are 190 international laws, many of which have been adopted by countries as national law, which aim to improve the labour standards under which people around the world work.

- **The Ethical Trading Initiative (ETI) Base code** are 9 clauses based on the ILO conventions. Many retailers are members of the ETI and have signed an agreement to this Code of Conduct and work to ensure their suppliers meet the Code clauses.

- **The United Nations Sustainable Development Goals (SDGs)** are 17 targets agreed by the UN for international development with a vision of ending poverty, reducing inequality, protecting the planet and ensuring that all people enjoy peace and prosperity.
These standards and laws contain requirements that businesses should or need to achieve. They cover issues such as forced labour, child labour, gender discrimination, illegal wages and work hours, and denial of freedom of association rights. These labour abuses both harm workers and their families and they also undermine business productivity. Poor working conditions reduce workers’ ability to thrive in their jobs, lowering commitment, performance and retention. The cost of replacing and retraining workers can be a significant drain on a company’s bottom line.

Responding to recurring labour issues, legal violations, negative audit findings, and customer dissatisfaction represents another cost as well.

The purpose of this guidance is to explain the key elements of a management system that will help you to put in place a management system to avoid common violations of these standards and to address problems if they arise and, in many cases, improve business performance. As outlined in the following chapters, management systems do not need to be complex to be efficient and beneficial.

The Benefits

**Why should you do it?**

- **Sustained legal compliance**
- **Higher productivity**
- **Fewer audits**
- **Attract and retain employees**
- **Customer recognition**

Throughout this chapter you will see boxes with the below symbols. These boxes contain useful tips and tools which will help you implement the guidance in your own business.

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<th><strong>Tips</strong></th>
<th>Practical guidance points on how to implement management systems</th>
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<td><strong>Good practice</strong></td>
<td>Examples of how to embed mature management systems in your day to day practices</td>
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Labour Management System

What does it mean?

A management system is the way a company runs its day-to-day operations, makes decisions and helps avoid recurrence of common problems. Every company, from multinational corporations to small holder farms, has a management system in place, in some form or another.

You may currently have an informal system, with your staff and workers relying mostly on verbal direction and not much in the way of documentation or formal checking to see if things are working properly.

If you operate a more advanced system, you may have written policies and procedures in place, your employees are trained so they fully understand what to do and how to do it, and there’s a process to check that your policies and procedures are being followed. A more formal labour management system will support you in meeting legal and customer standards, including those referenced in the introduction, from the time you hire your workers to the end of their employment. Your system will help make sure that ethical recruitment practices are followed, that workers are assigned jobs based only on their ability to do the work, are paid properly, do not work too many hours, are treated with respect, disciplined fairly, and in the end, leave or are terminated in a way that respects their legal rights. It should account for directly and indirectly employed workers and those that work remotely, including homeworkers.

The biggest distinction between having a basic or an advanced management system is how good a job you do at avoiding a problem rather than just trying to fix it after it happens. For example: a simple system reacts when workers quit because of harassment by supervisors, while an advanced system identifies the risk of this happening so you can take steps to control the issue before it becomes a significant problem.

Research has shown that improving labour standards is good for your business. Poor working conditions are often linked to increased absenteeism and worker turnover, and this costs your business money. By improving these conditions and meeting labour standards, it can help you to attract and retain workers and lead to a happier, more productive workforce.

This guidance explains the system elements you’ll need to manage labour standards in your company and how to put them in place or strengthen the ones you have.

Sedex has created a Management Controls Report for companies that complete a Self-Assessment Questionnaire. It calculates a score based on SAQ answers on how you manage labour, health and safety, environment, business ethics and supplier management in your business.

Throughout the guidance any section marked with a star will help provide guidance on how to improve your score. Once you have implemented the guidance, update your SAQ and see if/how your score improves.

To find out more about the Sedex SAQ please click here
# Key Elements of a Management System

**What steps do I need to take?**

The path to an advanced management system starts with adopting the following basic system elements, which will be described in more detail further down.

<table>
<thead>
<tr>
<th>Element</th>
<th>Description</th>
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<tbody>
<tr>
<td><strong>Policies</strong></td>
<td>Describe your commitments and goals, for example, to avoid the use of child labour, and should include commitments to meet legal and customer requirements.</td>
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<tr>
<td><strong>Resources</strong></td>
<td>Refers to the staffing, roles, responsibilities, knowledge and skills needed for carrying out your procedures in a way that meets the intent of your policies. For example, HR teams will need enough staff to recruit workers and they need to know why they should not hire child labour. They will also need the skills to verify documents and know how to identify young workers during interviews.</td>
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<tr>
<td><strong>Procedures</strong></td>
<td>Are the step-by-step instructions that create a process for you to achieve your policies. For example, they can include instructions on what steps to take, who will do the job, the documentation needed and how to monitor progress. Risk Controls (sometimes called Management Controls) are procedures that are specifically designed to address a particular identified risk. For the recruitment and hiring process, processes and procedures would include reviewing applications, interviewing, checking documents and contracting a candidate. They include 'risk controls' – like age verification – that are specifically designed to avoid compliance issues like hiring an underage worker.</td>
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<tr>
<td><strong>Documentation</strong></td>
<td>Means the written documents and records needed to make sure that your procedures are followed consistently and demonstrate your compliance with legal and customer requirements. This may mean having a documented procedure for recruitment and saving a copy of documents used for age verification for all workers within each employee's personnel file.</td>
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<tr>
<td><strong>Monitoring</strong></td>
<td>Is how you check whether your procedures are being followed and working well and whether you're compliant with the law and your customers' standards. This could involve checking ages, checking age verification process and monitoring working hours and pay of young workers.</td>
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<tr>
<td><strong>Communication and Training</strong></td>
<td>Builds staff awareness and ability through information and instruction. At a minimum all your employees should know about your policies and procedures and what the law says. All workers should know the minimum age for work and supervisors may need to know specific rules for managing young workers, for example.</td>
</tr>
<tr>
<td><strong>Improvement</strong></td>
<td>Means addressing compliance issues, such as hiring underage workers, by finding and removing the root cause of the problem. For example, lack of effective age screening which may require revising your procedure and retraining the employees responsible for checking the age of job applicants.</td>
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The section below provides more information on each of these elements as well as tools, tips and checklists to help you to implement these systems in your company.

**Tailor Labour Management to your workforce**

Understanding the challenges workers might face and adapting systems accordingly helps to build inclusive workplaces. These enable employees to reach their full potential, which has a positive impact on overall workforce performance.

Some examples include:

- Women have different needs to men that should be considered when developing processes around labour management – for example women may be more likely to experience harassment or discrimination at work due to their sex.

- Training and communication should consider language needs of migrant workers – if migrant workers are not fluent in your workplace language, they will need health and safety instructions translated and explained to them in their own language, in order to be safe.
Requirements

What do you need to do and how do you do it?

The next two sections will show you how you can improve your “Policies and Resources” score.

Policies

You should, at a minimum, have a system to comply with all applicable labour and human rights laws and standards, and customer requirements.

Adopting a systems approach to labour management in will help you address this in your business and with your suppliers.

Your policies state your company’s values; what does the company stand for – what is acceptable and not acceptable to the business. At a minimum, they need to give a commitment to complying with the law, the ETI Base Code, and your customers’ requirements. They should be signed by the most senior manager of your company and should include:

- Employment is freely chosen.
- Freedom of association and collective bargaining.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practised.
- Regular employment is provided.
- No harsh of inhumane treatment is allowed.

These commitment statements set the objectives for the rest of your system to achieve, and let your customers, suppliers, your own employees and the public know what you stand for.

Help your Management Systems succeed

It is important to ensure that you have active engagement from your senior management team when creating these policies. A lack of commitment from senior management within your business, or management belief that the social compliance objectives will conflict with business objectives will not support the integration of your policies within the business.
You will need to assign roles and responsibilities to your staff and employees, and time to carry them out, to make sure that the people responsible for implementing processes, policies and procedures understand and consistently follow them.

✔ Assign a senior manager with defined responsibility and accountability for meeting the objectives of your labour policy and overseeing how the management system is working. For example, you may have a policy on discrimination. The most senior member of the Human Resources (HR) department may have the job to implement the policy and ensure the policy is implemented across the company, to make sure it is successful.

✔ Also make sure your managers, supervisors, and employees have clearly defined roles and responsibilities. As examples, the HR team should be allocated responsibility for verifying the age of job applicants and making sure all workers are paid at least the minimum wage.

✔ Ensure the people involved in achieving a policy, have the training needed to do their jobs well. For example, it is important that the HR Manager understands the importance of the labour policies and knows how to implement them in their day to day job.

Assigning Responsibilities

People perform best when they know exactly what their responsibilities are.

One of the best ways to hold managers and employees accountable for following procedures and other system responsibilities is to include those responsibilities in their job descriptions and then check how well they are fulfilling their responsibilities as part of their regular performance evaluations.
Processes and Procedures

The next two sections will show you how you can improve your “Processes” score through introducing procedures and ensuring things are documented

Your processes and procedures are the “who-what-how” instructions that need to be followed to in your day to day operations to meet both your business objectives and your policies, for example to avoid discrimination in hiring. Some procedures will function as ‘risk controls’ which are designed to address a specific identified risk, like favouritism in hiring or promotions. An example of such a risk control is a procedure to evaluate each candidate for hiring or promotion based solely on their achievements and ability to assume the role. Processes and procedures should be designed to bring your policy into day-to-day practice and make sure your policy happens in reality. They help your policy achieve its intention.

Examples of the labour procedures you should have include:

✔ A way to stay up to date on labour laws, regulations and your customer’s social responsibility requirements.

✔ A way to identify compliance risks, ideally before something goes wrong, so that you can put controls in place. For example, a procedure to track wages by gender to make sure male and female workers are paid the same for the same work.

✔ Procedures to comply with each of the labour standards of the ETI Base Code. For example, you will need ways to make sure you discipline employees fairly and humanely and to keep employee working hours within legal and Code limits.

✔ A way to receive, investigate and address complaints or concerns from your workers about workplace conditions, including a way for them to raise a grievance anonymously.

✔ A process to choose your suppliers and on-site service providers based on whether they can meet the ETI Base Code standards and your own policies. This should be considered for service providers such as your logistics companies, as well as goods providers and your labour providers.

Don’t duplicate or overcomplicate the process

Your systems should be integrated into the day to day processes and procedures of workers and managers. Creating complicated systems which sit outside of people’s roles and responsibilities may leave greater room for error.

For example, ensuring age verification checks are made as a part of the hiring process before workers start rather than retrospectively requesting the documents will support a more robust system.
To carry out your policies, processes and procedures consistently, regardless of staff changes, documentation (written instructions) is important. You should also keep formal records (of your payroll, how you solved a worker grievance, a training provided, for example) that show what you have done to conform with the ETI Code and legal requirements. This includes:

- An up-to-date register of all applicable laws, regulations and customer codes of conduct.
- Formal records such as payroll, employee documentation, grievances raised, sickness records etc. Segregating this data by male and female can give you greater insight into the different issues faced by men and women in your workforce. This can help you to track trends and make data-informed, strategic human resource decisions.
- Copies of internal and third-party audit reports, and inspection reports by regulatory agencies.
- Corrective action plans and records that show improvement actions were taken and solve the problem.

Document your procedures whenever possible to make sure they are followed consistently.

Documentation doesn’t have to be complicated; it can be a simple checklist for employees to follow. Documented procedures reduce confusion about who is supposed to do what, how is the task supposed to be done and what are the best practises to follow, saving time and helping employees be more efficient. In this way, procedures can also act as a form of training for new workers.
Ongoing monitoring is how you know if your policies, processes and procedures are being followed and are having the intended effect.

Monitoring can take many forms but should be on-going so you can see how you are doing and adjust if there is a need for improvement. For example, an effective worker feedback and grievance mechanism is a good monitoring tool and can let you know if workers are experiencing unfair treatment, have issues with their wages, or have safety improvement ideas.

By monitoring worker opinion in this way, you can address problems as they are reported and potentially avoid workers leaving the company because of issues.

Monitoring includes:

- ✔ Internal or 3rd party audits.
- ✔ Setting and measuring progress on Key performance indicators (KPIs). Examples of KPIs include accidents and injuries, the number of male and female workers promoted to supervisors, absenteeism rate, staff turnover rate, the percentage of grievance reports resolved to the workers’ satisfaction or the number of corrective actions implemented on time.

Regular worker surveys to measure how satisfied workers are with workplace policies and procedures and what changes would help them do their jobs more efficiently.

Segregate data whenever and wherever possible

Segregating the data you have for your workers by gender, sex, nationality, language groups etc will help you start to understand your workforce and the issues that affect them. From this you can start to track trends which will help you to improve your systems by tailoring them to mitigate the issues different workers face on a day to day basis.
To make sure your policies, processes and procedures are implemented effectively, it is important that you:

- Give basic training to all your managers, supervisors and workers on your policies and related procedures.
- Provide in-depth skills training for the staff responsible for implementing specific procedures.

Post your labour policies and local laws and regulations where workers can read them easily and in a language they understand. If workers don’t read or have difficulty reading, pictures can help, but make sure the meaning is explained to them verbally too.

Everyone in your workplace needs to know the rules and their responsibilities.

This includes contractors and service providers. You should communicate your labour and legal requirements to your on-site service providers in contract terms and conditions and periodic business reviews.

To make sure all workers receive training, you can include essential training as part of the company induction i.e. the training received when a new person joins the company. Consider if refresher training is needed too, perhaps every year to ensure everyone remembers and is clear on what to do.

What makes training effective?

Training is usually given when people need to know about something or to increase their skills to improve their job performance. Learning objectives should be set for any training and describe what knowledge should be gained from the training or what skills will be learned or improved. Training is effective when learning objectives are met.

You measure training effectiveness by determining how well you achieved the objectives.

For example, you may be concerned that supervisors yell at workers and decide to train supervisors in better communication and management techniques. The learning objective in this case may be to provide supervisors skills in motivating workers without yelling or issuing punishments. You can review whether the training was successful by monitoring supervisor behaviour, both by observation and employee feedback.
Improvement

To address any issues and improve your compliance with labour standards, it’s important to understand the root cause of the issue first. By tackling the cause of the issue, rather than the symptom, you can better adjust your management system (the elements and actions listed above) to keep the problem from happening again.

For example, if you find that female workers are not receiving as many bonuses as their male colleagues, you will need to ask questions such as: Does your incentive program favour men? Has the responsible person not been trained on your non-discrimination policy? On hiring are women being assigned to lower-skilled jobs than men? Is there a lower promotion rate for women? Are they not being given the same level of technical instruction as their male counterparts? Is this a company-wide issue or only in some sections?

You can use the 5 Why exercise to help you identify the root cause. See diagram below.

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### Use the 5 Whys to help with Root Cause Analysis

**Problem**
Production employees are making less than the minimum wage

1. **Why?** Employees are not getting paid for all the hours they work
2. **Why?** They are on piece work and need to work extra hours to meet quota
3. **Why?** The quota can’t be met by an average employee in a regular shift
4. **Why?** Production equipment downtime is too high
5. **Why?** There is no preventative maintenance equipment

**Solution**
1. Implement a preventative maintenance process.
2. Establish equipment uptime requirement (e.g. 95%)
3. Collect and analyse equipment uptime data.
4. Change compensation procedure to ensure production employees are paid for all regular and overtime hours worked.
The basic rules for responding to any issue are:

✔✔ Implement both corrective and preventive action to address each identified root cause, so that the problem does not recur and the solution itself does not create other problems. For example, you may increase female workers’ bonuses (corrective action) and increase the number of women who receive training and promotions (preventative actions).

✔✔ Assign task owners, milestones, and completion dates for any improvement actions.

✔✔ Make sure that your employees know how to follow any new or revised procedures you have developed to address a risk through initial and refresher training as needed.

✔✔ Monitor whether the adjustment in your procedures and supporting training have been made, and whether they are producing the desired result. For example, you may change your policy to state the male and female employees must receive the same training opportunities, but only through creating a procedure to ensure this and then monitoring the numbers of men and women trained can you see if this happens in reality.

Achieving Improvement

A company is facing the challenge of high worker turnover. This costs money and affects quality, so they want to address this issue. The company sets a new objective to be the ‘employer of choice’ in its area. It chooses the targets for this objective to achieve a staff turnover of 1% per month and a worker satisfaction survey score of 90%. They start taking actions to improve worker satisfaction at work.

The site manager and her staff evaluate their progress each quarter in a management review meeting. Based on the review, they make changes to their policies and procedures if they find issues that are impacting worker satisfaction and their ability to achieve their improvement goals.
Case study

Centralising Labour and Human Rights

An effective labour management system enables organisations to achieve its business, legal and social responsibility objectives. Over the last 30 years, G’s has been implementing projects designed to protect workers’ rights and mitigate the risk of labour exploitation within its operations. This best practice approach was reinforced when the business made a strategic decision to set up a central and independent Ethics Department tasked with driving an ethical trading strategy across its operations and throughout its supply chain.

G’s strategy is made up of four pillars:

- **Mitigation**: Develop resilient and efficient labour management structures which protect both workers’ rights and business reputation from any external harm.
- **Detection**: Implement a collaborative approach at all levels of the business to identify any breach of standards at the earliest stage.
- **Management**: Promote best practice management on any ethical or labour issue.
- **Ownership**: Provide the right awareness, knowledge and skills across the business to uphold ethical standards and company values.

The policy framework sets group standards on ethical and human rights due diligence. Within this document, tackling Modern Slavery has become one of the strategic pillars. G’s has developed a specific programme covering areas such as training, detection, reporting and case management. The internal training plays a pivotal role to support the ethical and modern slavery due diligence systems. This training is provided to all members of staff, from senior management to team leaders, with a specific focus on sensitive roles like recruitment.

Various channels are available to workers to report anonymously potential cases of exploitation. Any information is analysed and investigated independently by the Group Ethics Department.

Additionally, G’s developed specific labour provider ethical management systems. There are Service Level Agreement with all agencies that incorporates key elements of G’s Ethics strategy and regular audits are conducted to monitor compliance against it. Risk assessment tools benchmark all agencies and measure their fulfilment against the G’s Modern Slavery framework.

This strategy has produced tangible benefits for the business’ reputation, its workforce and the communities where G’s operates. It has helped the G’s to improve its staff retention and attraction figures and has significantly increased awareness on Modern Slavery throughout its workforce. G’s is an advocate of increasing the knowledge and transparency of workers’ rights, which they believe has and will continue to empower their workforce and has created a more balance workplace environment.

**G’s Fresh** is a fresh produce grower and supplier to major UK and European retailers. They have farms and production facilities throughout the UK, Spain, Eastern Europe, USA and South Africa.
Frequently Asked Questions

Do I need a separate management system for social responsibility?

No. The most efficient way to apply a management system approach to meeting labour standards is to use your current business management system. For example, every company needs to hire workers. In order to avoid child labour, discrimination, forced labour and other issues in hiring, you should evaluate your current processes for recruitment, selection and hiring of workers to make sure you have the right controls in place.

Of course, once you have put the necessary controls in place you will need to do regular checking (monitoring) to be sure they are effective.

Won't a management system require a lot of documentation and other complexity?

This is a very common concern, but a labour management system does not need to be any more formal or complex than the system you use to manage your business.

For example, a procedure can be as simple as a short list of what is to be done, by whom, and how often.

As for records, you only need to maintain items that are needed to verify that you are meeting standards, such as proof of age documents, working hours and payroll. Such records are commonly required in most countries to meet local legal requirements.

My company has a certified Quality Management System. Can we use this system for labour?

Yes. In fact, any company that has a formal management system, like ISO 9000 or ISO 14001, should also use it to manage compliance to labour standards rather than creating a separate labour management system. The risk assessment, regulatory tracking, training, communication, auditing, corrective action, and other elements of these systems can very easily be adapted for labour management.
What if we don’t already have a formal management system. Are there any standards we can follow?

Yes, there are a number of management system standards developed specifically for labour and other sustainability issues. These include:

- **SA8000**: This is the only labour management system standard to which a company can be certified. Complying with the requirements of this standard will enable a company to:
  - Develop, maintain, and enforce policies and procedures in order to manage those issues which it can control or influence.
  - Credibly demonstrate to interested parties that existing company policies, procedures, and practices conform to the requirements of this standard.

- **ISO 26000** – Social Responsibility: Provides guidance on how organisations can build on existing systems, policies, and networks of the organisation to put social responsibility into practice.

- **ISO 24000** – Sustainable Procurement: How organisations can manage risks (including opportunities), address adverse sustainability impacts through due diligence, setting priorities, exercising positive influence and avoiding complicity in labour rights abuses

What is Plan-Do-Check-Act?

**Plan-Do-Check-Act** is a way of describing a management system to show how risks are controlled and processes and performance are continually improved. It is the framework on which all of the ISO management system standards are based, including ISO 9000, ISO 14001 and ISO 45001.

- **Plan** means to identify requirements (laws and standards), evaluating risks that may prevent you from meeting those standards, and establishing objectives and processes needed to meet standards and achieve objectives.

- **Do** means assigning responsibilities, implementing your policies and procedures, and training and communicating.

- **Check** is another word for monitoring and making sure that you are achieving your objectives and meeting standards. This involves measuring performance using KPIs, performing audits, surveying workers, and other ways to evaluate how you are doing.

- **Act** is another way of saying Improvement -taking corrective and preventive actions when your results are different from your goals, such as when audits find non-compliances. This step also includes a regular review by senior management of the suitability and effectiveness of your overall system. Outcomes and decisions from that review are used to Plan system improvements.

You may notice that the above guidance also follows a Plan Do Check Act approach.
Resources and Guidance

The following sources provide further details on international standards for labour management systems.


- Ethical Trading Initiative (ETI): http://www.ethicaltrade.org/

- ETI Base Code: http://www.ethicaltrade.org/eti-base-code

- A decent work management system by any other name – 5 lessons: https://www.ethicaltrade.org/blog/decent-work-management-system-any-other-name-5-lessons

Signposts to Training

- Verité: http://www.verite.org/Training

- ETI, Essential of Ethical Trade: http://www.ethicaltrade.org/training/essentials-ethical-trade
Key Terms

- **Corrective Action**: is the implementation of a systemic change or solution to make an immediate and on-going remedy to a non-compliance.

- **Labour**: is the overall term used to describe the workers in your business that help deliver the products and/or services your business offers. Workers may be hired directly or provided by agencies, work at your site or remotely at different sites, in vehicles (mobile workers) or at home (homeworkers).

- **Labour management**: refers to the expectation for companies to operate in compliance with legal and customer requirements for providing their workers with fair, safe and humane working conditions.

- **A management system**: is how a company gets things done. It is made up of interdependent policies, processes, and procedures organized to enable a company to achieve its business objectives (quality products, on-time delivery, profitability) and meet code of conduct expectations.

- **A policy**: is a statement of commitment to what the company hopes to achieve. For example, “our company will not work with suppliers who employ child labour.”

- **Preventive Action**: is the implementation of a systemic change or solution designed to prevent the recurrence of the same or similar issues elsewhere in the facility.

- **A process**: is a major part of the system, consisting of a set of actions and procedures that together make up a business function. For example, the recruitment, selection and hiring process is designed to hire the right person for the job at the right time.

- **Procedures** (also referred to as “controls”) are step-by-step descriptions of how a job or task within a process is done; by whom and when. For example, a procedure to verify the age of a job applicant is part of the recruitment process.

- **Risk controls** or **Management controls** are the processes, steps or improvements made to address the possibility of an unintended outcome. They are part of a company’s management system. For example, steps to validate the authenticity of a job applicant’s proof of age documentation are designed to reduce the risk of hiring an underage worker.
The four Management System guidance documents were developed by Sedex with Verité’s input.

They are aligned with the Plan-Do-Check-Act continuous improvement approach used by ISO and other international management systems standards. In this guidance, we split management systems into 4 sections: Policy and Resources, Processes and Procedures, Monitoring, and Training and Improvement.

Verité’s recommended structure for Management Systems steps is that “Monitoring” follows “Training and Improvement,” but these guidance documents list “Monitoring” first in order to align with the management controls report, which members receive on completion of the SAQ.