



**Sustainable Leather Foundation
Standard for Worker Health and Safety**

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FSS8 WORKER HEALTH AND SAFETY STANDARD AND BENCHMARK

Summary: The SLF *Worker Health and Safety Standard and Benchmark* provides the context, definitions, relevant international norms and expectations for protection of the immediate, short-term and long-term health and wellbeing of workers. This document gives the facility under audit the principles and general expectations, but it is not exhaustive and recognises that there will be differences within regions for national and local laws. Where there are matters of interpretation in relation to the standard, applicable laws or organisational norms, the auditor will assess in favour of the employees in that facility.



1. Scope

1.1 The SLF *Worker Health and Safety Standard and Benchmark* specify the definitions and methods of protection for workers employed for specific tasks in facilities operating in the leather value chain. The facilities in the value chain include all facilities from the farm to the end of life of the leather.

1.2 The SLF *Worker Health and Safety Standard and Benchmark* is intended to ensure that all workers at an SLF certified facility are safe and are not exposed to risks from machinery, hazardous chemistry, unsafe working environments that could give exposure to workplace accidents or illness. Workers shall also be provided with appropriate rest areas, safe water for drinking and sanitation, PPE as required and safe accommodation if applicable.

1.3 The SLF *Worker Health and Safety Standard and Benchmark* is also concerned with protecting new, expectant and nursing mothers, ensuring that adequate facilities are provided and that risks are assessed and removed.

2. Normative references

2.1 The following references are useful in the understanding of this document and are provided for further guidance. In the case of dispute these references will form the core of the evidence in support of the Standard and Benchmarks used here:

ILO Convention 155 – Occupational Safety and Health 1981¹

ILO Convention 161 – Occupational Health Services, 1985²

ILO Convention 170 – Chemicals, 1990³

ILO Convention 174 – Prevention of Major Industrial Accidents, 1993⁴

¹ ILO Convention 155 Occupational Safety and Health, 1981

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312300:NO

² ILO Convention 161 Occupational Health Services, 1985

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312306:NO

³ ILO Convention 170 Chemicals, 1990

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312315:NO

⁴ ILO Convention 174 Prevention of Major Industrial Accidents, 1993

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312319:NO



ILO Convention 183 – Maternity Protection Convention, 2002⁵

ILO Convention 187 – Promotional Framework for Occupational Safety and Health, 2006⁶

OECD Due Diligence Guidance for Responsible Business Conduct⁷

OECD Due Diligence for Responsible Supply Chains in the Garment and Footwear Sector⁸

UN Guiding Principles on Business and Human Rights⁹

3. Terms and definitions

- 3.1 **Facility:** The entirety of the business operation that is responsible for meeting the requirements of this *SLF Wages & Benefits Standard and Benchmark*, including all personnel employed at the facility (e.g. tannery, sub-contracting facility, head office organisation, etc)
- 3.2 **Corrective Action:** Action to eliminate the cause(s) and root cause(s) of a detected non-conformance (corrective = prevents a reoccurrence)
- 3.3 **Preventative Action:** Action to eliminate the cause(s) and root cause(s) of a potential non-conformance (preventative = prevents occurrence)
- 3.4 **Non-conformance:** Inability to meet the requirements of the standard.
- 3.5 **Personnel:** All individuals employed or contracted by the facility to perform specified tasks (e.g. directors, managers, warehouse operatives, cleaners, technicians, etc)
- 3.6 **Remediation:** Support and actions implemented to correct the failure of meeting the standard within an agreed time period.

⁵ ILO Convention 183 Maternity Protection Convention, 2000
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C183

⁶ ILO Convention 187 Promotional Framework for Occupational Safety and Health, 2006
https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312332:NO

⁷ OECD Due Diligence Guidance for Responsible Business Conduct <http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

⁸ OECD Due Diligence for Responsible Supply Chains in the Garment and Footwear Sector <https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1625664837&id=id&accname=guest&checksum=C1516BE172307EAE8D7EC925A2553C8B>

⁹ UN Guiding Principles on Business and Human Rights
https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf



- 3.7 **Risk Assessment:** A process to identify the leather, safety and labour aspects and impacts to assess potential of risk and category of priority to provide protective measures against the risk.
- 3.8 **Worker:** All non-management personnel

4. Principle

4.1 The principle of the *SLF Worker Health and Safety Standard and Benchmark* is based upon the international normative reference of the International Labour Organisation's (ILO) "Occupational Safety and Health Convention 155 (1981)" that specifies under Articles 4, 5, 6 and 7:

Article 4

1. Each Member shall, in the light of national conditions and practice, and in consultation with the most representative organisations of employers and workers, formulate, implement and periodically review a coherent national policy on occupational safety, occupational health and the working environment.

2. The aim of the policy shall be to prevent accidents and injury to health arising out of, linked with or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Article 5

The policy referred to in Article 4 of this Convention shall take account of the following main spheres of action in so far as they affect occupational safety and health and the working environment:

(a) design, testing, choice, substitution, installation, arrangement, use and maintenance of the material elements of work (workplaces, working environment, tools, machinery and equipment, chemical, physical and biological substances and agents, work processes);

(b) relationships between the material elements of work and the persons who carry out or supervise the work, and adaptation of machinery, equipment, working time, organisation of work and work processes to the physical and mental capacities of the workers;

(c) training, including necessary further training, qualifications and motivations of persons involved, in one capacity or another, in the achievement of adequate levels of safety and health;

(d) communication and co-operation at the levels of the working group and the undertaking and at all other appropriate levels up to and including the national level;

(e) the protection of workers and their representatives from disciplinary measures as a result of actions properly taken by them in conformity with the policy referred to in Article 4 of this Convention.

Article 6

The formulation of the policy referred to in Article 4 of this Convention shall indicate the respective functions and responsibilities in respect of occupational safety and health and the working environment of public authorities, employers, workers and others, taking account both of the complementary character of such responsibilities and of national conditions and practice.

Article 7



The situation regarding occupational safety and health and the working environment shall be reviewed at appropriate intervals, either over-all or in respect of particular areas, with a view to identifying major problems, evolving effective methods for dealing with them and priorities of action, and evaluating results.

4.2 In addition, the International Labour Organisation's (ILO) "Occupational Health Services Convention 161 (1985)" that specifies under Article 5:

Without prejudice to the responsibility of each employer for the health and safety of the workers in his employment, and with due regard to the necessity for the workers to participate in matters of occupational health and safety, occupational health services shall have such of the following functions as are adequate and appropriate to the occupational risks of the undertaking:

- (a) identification and assessment of the risks from health hazards in the workplace;*
- (b) surveillance of the factors in the working environment and working practices which may affect workers' health, including sanitary installations, canteens and housing where these facilities are provided by the employer;*
- (c) advice on planning and organisation of work, including the design of workplaces, on the choice, maintenance and condition of machinery and other equipment and on substances used in work;*
- (d) participation in the development of programmes for the improvement of working practices as well as testing and evaluation of health aspects of new equipment;*
- (e) advice on occupational health, safety and hygiene and on ergonomics and individual and collective protective equipment;*
- (f) surveillance of workers' health in relation to work;*
- (g) promoting the adaptation of work to the worker;*
- (h) contribution to measures of vocational rehabilitation;*
- (i) collaboration in providing information, training and education in the fields of occupational health and hygiene and ergonomics;*
- (j) organising of first aid and emergency treatment;*
- (k) participation in analysis of occupational accidents and occupational diseases.*

4.3 In addition, the International Labour Organisation's (ILO) "Chemical" Convention 170 (1990) that specifies under Article 2:

For the purposes of this Convention:

- (a) the term chemicals means chemical elements and compounds, and mixtures thereof, whether natural or synthetic;*
- (b) the term hazardous chemical includes any chemical which has been classified as hazardous in accordance with Article 6 or for which relevant information exists to indicate that the chemical is hazardous;*
- (c) the term use of chemicals at work means any work activity which may expose a worker to a chemical, including:*
 - (i) the production of chemicals;*
 - (ii) the handling of chemicals;*



- (iii) the storage of chemicals;*
- (iv) the transport of chemicals;*
- (v) the disposal and treatment of waste chemicals;*
- (vi) the release of chemicals resulting from work activities;*
- (vii) the maintenance, repair and cleaning of equipment and containers for chemicals;*
- (d) the term branches of economic activity means all branches in which workers are employed, including the public service;*
- (e) the term article means an object which is formed to a specific shape or design during its manufacture or which is in its natural shape, and whose use in that form is dependent in whole or in part on its shape or design;*
- (f) the term workers' representatives means persons who are recognised as such by national law or practice, in accordance with the Workers' Representatives Convention, 1971.*

4.4 In addition, the International Labour Organisation's (ILO) "Prevention of Major Industrial Accidents" Convention 174 (1993) that specifies under Article 3:

For the purposes of this Convention:

- (a) the term **hazardous substance** means a substance or mixture of substances which by virtue of chemical, physical or toxicological properties, either singly or in combination, constitutes a hazard;*
- (b) the term **threshold quantity** means for a given hazardous substance or category of substances that quantity, prescribed in national laws and regulations by reference to specific conditions, which if exceeded identifies a major hazard installation;*
- (c) the term **major hazard installation** means one which produces, processes, handles, uses, disposes of or stores, either permanently or temporarily, one or more hazardous substances or categories of substances in quantities which exceed the threshold quantity;*
- (d) the term **major accident** means a sudden occurrence - such as a major emission, fire or explosion - in the course of an activity within a major hazard installation, involving one or more hazardous substances and leading to a serious danger to workers, the public or the environment, whether immediate or delayed;*
- (e) the term **safety report** means a written presentation of the technical, management and operational information covering the hazards and risks of a major hazard installation and their control and providing justification for the measures taken for the safety of the installation;*
- (f) the term **near miss** means any sudden event involving one or more hazardous substances which, but for mitigating effects, actions or systems, could have escalated to a major accident.*

4.5 In addition, the International Labour Organisation's (ILO) "Protocol of 2002 to the Occupational Safety and Health Convention" 155 (1981) that specifies under "Systems for Recording and Notification under Articles 2, 3, 4 and 5:

Article 2

The competent authority shall, by laws or regulations or any other method consistent with national conditions and practice, and in consultation with the most representative organizations of employers and workers, establish and periodically review requirements and procedures for:



- (a) the recording of occupational accidents, occupational diseases and, as appropriate, dangerous occurrences, commuting accidents and suspected cases of occupational diseases; and*
- (b) the notification of occupational accidents, occupational diseases and, as appropriate, dangerous occurrences, commuting accidents and suspected cases of occupational diseases.*

Article 3

The requirements and procedures for recording shall determine:

(a) the responsibility of employers:

- (i) to record occupational accidents, occupational diseases and, as appropriate, dangerous occurrences, commuting accidents and suspected cases of occupational diseases;*
- (ii) to provide appropriate information to workers and their representatives concerning the recording system;*
- (iii) to ensure appropriate maintenance of these records and their use for the establishment of preventive measures; and*
- (iv) to refrain from instituting retaliatory or disciplinary measures against a worker for reporting an occupational accident, occupational disease, dangerous occurrence, commuting accident or suspected case of occupational disease;*

(b) the information to be recorded;

(c) the duration for maintaining these records; and

(d) measures to ensure the confidentiality of personal and medical data in the employer's possession, in accordance with national laws and regulations, conditions and practice.

Article 4

The requirements and procedures for the notification shall determine:

(a) the responsibility of employers:

- (i) to notify the competent authorities or other designated bodies of occupational accidents, occupational diseases and, as appropriate, dangerous occurrences, commuting accidents and suspected cases of occupational diseases; and*
- (ii) to provide appropriate information to workers and their representatives concerning the notified cases;*

(b) where appropriate, arrangements for notification of occupational accidents and occupational diseases by insurance institutions, occupational health services, medical practitioners and other bodies directly concerned;

(c) the criteria according to which occupational accidents, occupational diseases and, as appropriate, dangerous occurrences, commuting accidents and suspected cases of occupational diseases are to be notified; and

(d) the time limits for notification.

Article 5

The notification shall include data on:

(a) the enterprise, establishment and employer;

(b) if applicable, the injured persons and the nature of the injuries or disease; and

(c) the workplace, the circumstances of the accident or the dangerous occurrence and, in the case of an occupational disease, the circumstances of the exposure to health hazards.

4.6 The governing principle of this document is to encourage facilities to actively implement robust policies, procedures and practices that protect against accident or illness of workers. Utilisation of effective Aspects and Impacts Risk Analysis and implement of plans and mechanisms shall be in force and actively considered as part of the every day business operations of the company.



5. Procedure

The facility will provide data and documentation that demonstrates an effective health and safety management system to meet the requirements of the *SLF Worker Health & Safety Standards and Benchmark* as follows:

- 5.1 Management System: The facility shall have a system in place that permits the company to provide all personnel with healthy and safe working environment, with consideration of:
 - a. All workplace Aspects and Impacts Risk Assessment
 - b. Minimisation of risk mechanisms and measures
 - c. Provision of necessary Personal Protective Equipment (PPE) in correct size and satisfactory quality at the expense of the company, not the worker, according to the respective task and risks
 - d. Provision of first aid and assistance with medical care if required
 - e. Training of personnel for:
 - i. Work related tasks (job-specific training)
 - ii. General workplace safety
 - iii. Fire alarm and emergency response training
 - iv. Training of an appropriate number of first aid responders
 - v. Risks associated with gender- based violence, including safe access with good lighting, safe changing rooms and facilities, and clear policy against any gender-based violence or discrimination
 - f. The need for all personnel to be freely able to leave their place of work if there is any serious imminent danger without first seeking permission
- 5.2 Clean Facilities: The facility shall provide, for all personnel, free access to rest areas for meals and breaks, clean drinking water provision, clean sanitary provision and toilets.
- 5.3 Accommodation: The facility shall provide (if required) clean, safe accommodation facilities that meet the basic needs of privacy, cleanliness and safety.

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