



## FSC Self-Assessment for FSC Core Labour Requirements:

United Kingdom

This template is designed for all FSC® Chain of Custody (CoC) certificate holders (CHs) in the United Kingdom. With the revision of FSC-STD-40-004 V3-1, CH's are required to complete a self-assessment of their conformance to FSC core labour requirements (hereinafter: self-assessment) as part of their annual audit.

FSC-STD-40-004 V3-1 FSC Chain of Custody Certification becomes effective on 01 September 2021. Until 31 December 2022 both version 3-1 and the previous version of the standard will be valid. By 31 December, all Certificate Holders and applicants for certification shall have been evaluated against version 3-1. After 31 December 2022, no new certificates can be issued based on the previous version. Any certificates for the previous version of the standard can be invalidated without further notification after 30 June 2023.

To test its practicality, this template is published as a beta version. This version may undergo changes during 2021 as we learn from feedback and initial audits. We invite you to send us your opinion and to give us your suggestions via the following online [form](#).

The self-assessment is designed to give the FSC CoC CH the ability to efficiently identify and document measures that demonstrate conformance with the FSC Core Labour Requirements.

The certification body will use the completed self-assessment to guide the audit and verify conformance with the standard. The process applies the organisation's knowledge of its operations and compliance with applicable laws to assist the auditor in completing the audit.

Certificate holders and organisations wishing to become certificate holders may use this template or they may create their own to demonstrate compliance with the requirements. The use of this template does not guarantee conformity with the FSC core labour requirements. It is the responsibility of the organisation to conform with FSC requirements.

Please refer to the [FSC UK Controlled Wood National Risk Assessment](#) (pages 84-109) to review the UK national regulations most relevant to the FSC core labour requirements. While national laws closely align with the FSC requirements, organisations must still provide practical examples of how the organisation complies with the requirements (e.g. listing



relevant laws is not sufficient). Organisations must submit a completed and signed self-assessment to their certification body prior to the scheduled audit. The template was prepared by FSC UK. For further clarification, you can contact FSC UK at [info@fsc-uk.org](mailto:info@fsc-uk.org).

The organisation shall declare on the self-assessment that the statements are true and correct to the best available knowledge. The organisation knowingly making false statements on its self-assessment may result in suspension or termination of the certificate.

The organisation shall respond to the questions in the self-assessment as completely and truthfully as possible. Organisations shall identify relevant documents and other materials that the auditor can review to verify the referenced statement on the self-assessment.

### Version History

Version	Date
1.0	18 August 2021
1.1	23 December 2022

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#### FSC UK

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### FSC Core Labour Requirements Self-Assessment

**Attestation:** I \_\_\_\_\_, hereby affirm that the following statements are true and correct to the best of my knowledge, and I acknowledge making a knowingly false statement can result in the suspension or termination of the certificate or non-issue of the certificate.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Date

Referenced is the [FSC UK Controlled Wood National Risk Assessment](#). Pages 84-109 details the UK National and local laws which are in compliance with the FSC core labour requirements. The UK has ratified all of the ILO Core Labour Conventions (see [http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200\\_COUNTRY\\_ID:102651](http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102651) ). There are differences in implementing legislation in individual countries which are noted in the FSC UK National Risk Assessment. *Note: This addresses only the principal legislation; for a full list, refer to the ILO website* ([http://www.ilo.org/dyn/natlex/natlex4.countrySubjects?p\\_lang=en&p\\_country=GBR](http://www.ilo.org/dyn/natlex/natlex4.countrySubjects?p_lang=en&p_country=GBR))



**Child Labour**

Requirement	Questions and additional Requirements	Common UK Examples of Evidence	Answer and evidence
7.2 The organisation shall not use child labour.	a) Does your organisation comply with Clause 7.2? If yes, continue at c).	Yes/No	
7.2.1 The organisation shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 7.2.2.	b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.2.		
7.2.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work, such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.2.		
7.2.3 No person under the age of 18 is employed in hazardous or heavy work	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.2.	<ul style="list-style-type: none"> <li>• Work contracts or agreements, including with recruitment agencies</li> <li>• Employment policy and hiring procedures, age verification procedure etc.)</li> <li>• Employee records including seasonal and migrant workers (age Register), identity documents such as copies of birth certificates or national ID cards</li> </ul>	



<p>except for the purpose of training within approved national laws and regulation. 7.2.4 The organisation shall prohibit the worst forms of child labour.</p>			
	<p>e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.2. Please describe them, and how they impact your ability to comply with Clause 7.2.</p>		
	<p>f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.2.</p>		

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**Forced Labour**

Requirement	Questions and additional Requirements	Common UK Examples of Evidence	Answer and evidence
<p>7.3 The organisation shall eliminate all forms of forced and compulsory labour.</p> <p>7.3.1 Employment relationships are voluntary and based on mutual consent, without the threat of a penalty.</p> <p>7.3.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• physical and sexual violence</li> <li>• bonded labour</li> <li>• withholding of wages /including payment of employment fees and or payment of deposit to commence employment</li> <li>• restriction of mobility/movement</li> <li>• retention of passport and identity documents</li> </ul>	<p>a) Does your organisation comply with Clause 7.3? If yes, continue at c).</p>	Yes/No	
	<p>b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.3?</p>		
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies Clause 7.3?</p>		
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.3.</p>	<ul style="list-style-type: none"> <li>• Modern Slavery statement and policy on the prohibition of forced labour</li> <li>• Employment offer letters/work agreements/contracts</li> <li>• Salary/Payment records</li> <li>• Labour inspection records</li> <li>• Employment contracts</li> <li>• Legal/Statutory deductions (tax, social security) and benefits</li> </ul>	

<ul style="list-style-type: none"> <li>threats of denunciation to the authorities.</li> </ul>		<ul style="list-style-type: none"> <li>National / industry pay/wage standards (for comparison)</li> <li>Dispute and grievance procedures and records</li> <li>Records of licensed recruitment agencies</li> </ul>	
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.3. Please describe them, and how they impact your ability to comply with Clause 7.3.		
	f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.3.		

### Discrimination in Employment and Occupation

Requirement	Questions and additional Requirements	Common UK Examples of Evidence	Answer and evidence
<p>7.4 The organisation shall ensure that there is no discrimination in employment and occupation.</p> <p>7.4.1 Employment and occupation practices are non-discriminatory.</p>	<p>a) Does your organisation comply with Clause 7.4? If yes, continue at c).</p>	Yes/No	
	<p>b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.4.</p>		
	<p>c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.4.</p>		
	<p>d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.4.</p>	<ul style="list-style-type: none"> <li>• Equal opportunity policy</li> <li>• Employment offer letters/work agreements/contracts</li> <li>• Salary/Pay records</li> <li>• Labour inspection records</li> <li>• Job advertisements</li> <li>• Job application records</li> <li>• Grievances/ complaints procedures and records</li> <li>• Job evaluation (appraisals)/performance assessments</li> </ul>	

		<ul style="list-style-type: none"> <li>• Positive discrimination or affirmative action programme</li> <li>• Employment demographic/gender ratio in job types</li> <li>• Discriminatory reports</li> <li>• Social responsibility policy</li> </ul>	
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.4. Please describe them, and how they impact your ability to comply with Clause 7.4.		
	f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.4.		

### Freedom of Association and the Right to Collective Bargaining

Requirement	Questions and additional Requirements	Common UK Examples of Evidence	Answer and evidence
7.5 The organisation shall respect freedom of association and the effective right to collective bargaining.	a) Does your organisation comply with Clause 7.5? If yes, continue at c).	Yes/No	
7.5.1 Workers are able to establish or join worker organisations of their own choosing.	b) If the answer is no to a) above, please describe how or why your organisation does not comply with Clause 7.5.		
7.5.2 The organisation respects the full freedom of workers' organisations to draw up their constitutions and rules.	c) For the individuals employed by you at the site/sites holding the certificate, describe how your organisation knows it complies with Clause 7.5.		
7.5.3 The organisation respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organisation, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.	d) Identify any documents or other records (and their location) that you rely upon to verify compliance with Clause 7.5.	<ul style="list-style-type: none"> <li>Organisational policies</li> <li>Complaints register</li> <li>Collective bargaining agreement</li> <li>Minutes or documents from meetings related to the development of the collective bargaining agreement</li> <li>Minister of labour/ Industrial Relations reports</li> <li>Court reports/awards</li> </ul>	
7.5.4 The organisation negotiates with lawfully established workers' organisations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.			

7.5.5 Collective bargaining agreements are implemented where they exist.		<ul style="list-style-type: none"> <li>Documented evidence and records of the workers' representative(s) elections</li> </ul>	
	e) Identify any legal obligations that you believe may impact your ability to comply with Clause 7.5. Please describe them, and how they impact your ability to comply with Clause 7.5.		
	f) Attach a policy statement, or statements, made by your organisation that encompasses Clause 7.5.		

**Examples of questions to answer in completing the self-assessment:**

FSC has provided the following open questions that may be helpful to the organisation to take into consideration when completing the self-assessment. The questions are divided into four categories addressed by the FSC core labour requirements. The level of detail required will depend on the location of the organisation’s facility, including the organisation’s assessment of risk, and the labour environment. This list of questions is not exhaustive.

Category	Question
<b>Child Labour</b>	<ul style="list-style-type: none"> <li>• What is the statutory, legal, or regulated minimum age at the place of your operations?</li> <li>• What measures have you taken to ensure that child labour is not used in your operations?</li> <li>• Do you register the age (birthday) of your workers and how do you verify that this is the actual age? Do you check the identification papers?</li> <li>• If there are legal or regulatory restrictions which to your understanding would limit your ability to comply with the requirement, describe how you mitigate those limitations.</li> <li>• If you employ workers below the age of 18, describe what measures you have taken to ensure that they don’t perform hazardous or heavy work. If there are a requirement for training and education, indicate supporting documents.</li> <li>• Is the employment of children between the age of 13 or 15 legally allowed? Do you employ children between that age? If yes on both accounts, specify measures you have taken to ensure that they only perform light work that is not harmful to their health or development and that allows them to work outside school hours only.</li> </ul>
<b>Forced Labour</b>	<ul style="list-style-type: none"> <li>• Describe your recruitment and contracting practices to show compliance with this principle.</li> <li>• Do you grant loans or salary/wage advances that would require a worker to extend his/her working beyond the legal or contractual agreements? If so, can you describe how you mitigate the risk of bonded labour in such a case?</li> <li>• How do you ensure that there are no employment fees deducted, or payments or deposits made to commence employment?</li> <li>• How do you ensure that the workers do not experience any form of mobility restriction?</li> </ul>

	<ul style="list-style-type: none"> <li>• How do you ensure that the workers have access to their passports and identification documents at all times while at the same time offering a safe place for storing the documents?</li> <li>• How do you ensure that there are no threats of denouncing workers to the authorities?</li> </ul>
<b>Discrimination</b>	<ul style="list-style-type: none"> <li>• How do you ensure that wages and other working conditions are non-discriminatory?</li> <li>• Is there gender/age ratio parity?</li> <li>• Do you have an ethnically diverse workforce?</li> <li>• Do you have policies about non-discrimination?</li> <li>• Do you ensure all employees have equal opportunity for promotion?</li> <li>• How do you ensure applicants have equal opportunity for employment?</li> <li>• If there are legal or regulatory restriction which to your understanding would limit your ability to comply with these requirements, describe how you mitigate these restrictions?</li> </ul>
<b>Freedom of Association and the Right to Collective Bargaining</b>	<ul style="list-style-type: none"> <li>• Are workers organised into a trade union? To the best of your knowledge, describe why you believe the workers have or have not chosen to be represented by a trade union.</li> <li>• If workers are represented by a union, is the union autonomous and independent?</li> <li>• What forms of worker representation other than unions exist at the site?</li> <li>• Are there collective bargaining agreements in place that cover workers, and if so, how do you ensure compliance with such agreements?</li> </ul>