

# Commodity Group

## Personal Protective Equipment (PPE)

This commodity group covers PPE in its key variants such as protective jackets, trousers, hard hats, gloves, glasses and footwear.

## What are the risks/issues associated with this commodity group

The prioritisation exercise undertaken by the ESCIC members in October 2011 identified PPE as high risk both because of the high likelihood of supply chain failure to comply with the agreed principles, and also because of the large volume of produce being procured across the Crossrail project. These risks emanate from the provenance of manufacture, with many of these products manufactured in the far east where issues of ethical sourcing are more prominent.

## Trade Associations

None relevant to ethical sourcing

(British Safety Industry Federation)

## Certified schemes covering Responsible Procurement

None found

## Investigations into Supply Chain

Given the breadth of PPE utilised across the construction industry, and indeed the volume of suppliers, the ESCIC group initially concentrated our investigations on trade associations that might be able to support our endeavours with ethical sourcing matters. Unfortunately there do not appear to be any bodies currently working on behalf of all PPE suppliers, nor does there appear to be any particular RP accreditation or certification prevalent within this market sphere.

Of the different suppliers, varying degrees of due diligence are being applied. Even where ETI based audits are conducted, concern needs to be raised with regard to accessibility to the production sites. For example, one UK provider was only allowed access to one floor of a 5 floor production facility on the basis that their products were all manufactured on that floor. The audit of activities on this floor only identified minor non-conformances and an agreed action plan was put into place. Conditions on other floors however could be very different.

It consulting with two of the UK's major suppliers it was noted that they are unable to break into the proprietary brands' own supply chains and as such are dependent on the information provided by these brands.

## **Proposed Actions for mitigation**

Suppliers were therefore considered on an individual basis and the group has begun discussions with each of the major ones to understand their ethical sourcing practices. Key items procured from the individual suppliers, for example the predominant safety boot, jacket or eye protection, have been identified in the first instance. Investigations have centered around:

- those sourced outside of Europe, and thus deemed higher risk
- the source of the supply
- Interrogation of the supplier's approach to ethical audit at source against the ESCIC "best practice" audit guidance

The suppliers who adhere to best practice typically employ third party independent social audits, understand current labour conditions at each site, and determine whether any corrective actions are required. Membership of the ETI is also something that should be looked for/specified when procuring.

## **Result of Mitigation**

At the time of writing investigations are still on-going though it has become evident that there is a schism between practices being applied across the industry. The ESCIC group continues to work with individual suppliers to identify any gaps between what we believe good looks like, and what the supply chain can practicably achieve.

## **Residual Supply chain risks**

Investigations to this point would suggest that our most widely used helmets and spectacles are UK sourced, clothing (jackets, waistcoats, trousers and polo-shirts) are largely coming in from China and specialist boots, gloves and ear plugs are a mix of both UK and world-wide sourcing.

## **Update at April-15**

Further to the above the ESCIC group has continued discussions with the key market supplier and has reached consensus that the major UK suppliers satisfy our requirements, with varying processes and approaches and differing levels of maturity but each with a commitment to the ethical sourcing agenda where sourcing outside of the EU.