A.I.S.E. Charter for Sustainable Cleaning

Guidance to the Charter Entrance Check

(Version 1.0, 23 may 2005)

1. INTRODUCTION

This document provides the applicant Charter participant with some generic and more specific guidance for the Entrance Check of the A.I.S.E. Charter for Sustainable Cleaning.

The document clarifies some concerns and / or misconceptions about the nature of the Check and gives you information about the evidence which has to be provided for the Entrance Check. The document also explains the scoring options for each of the control activities that have to be in place for the Entrance Check

If you require any further information or clarification regarding any of the details mentioned in this document, don't hesitate to contact the A.I.S.E. Project Management Office (see www.sustainable-cleaning.com).

2. WHAT THE ENTRANCE CHECK IS ABOUT

The Entrance Check maps and measures your current operational state of play in terms of achieving control over a set of predefined control activities for the Charter Sustainability Procedures (CSP's). For that purpose, each CSP has been divided in one or more domains and each domain has a set of predefined control activities.

The Entrance Check is not discussing "What" you are doing in the framework of the Charter, it is looking at the "How" of the implementation of the Charter so as to allow measurement of the way you manage specifically defined processes or outcomes at a specific domain.

There are several misconceptions concerning what the Entrance check is really about. Therefore, in this light, it is important to clearly state what it is **NOT** about:

- The Entrance Check is not part of the certification exercise of any kind of management system;
- It is not the purpose of the Entrance Check to discuss the content of any kind of existing (possibly certified) Quality or EH&S management programme in place.
  It is possible that some of the control activities are included in a specific management programme. If this is the case, you may have developed an operational framework to implement these. The focus of the Entrance Check lies on the level of achieved management control of this operational framework. This means that you will be able to use any operational evidence that allows scoring on the scoring card (see below). The kind of management system it is derived from is of no importance to the Entrance Check. As such you are free to use any kind of certified management system.
- The Entrance Check is not a Compliance Audit. It does not say anything about compliance with any regulations in place but focuses on the measurement of how you maintain management control over a set of predefined control activities.
- The Entrance Check is not a Financial or Internal Audit;
- The Entrance Check is not discussing the content of your control activities / management systems or programmes put in place;
- The Entrance Check is not a risk assessment.

3. HOW TO PROVIDE EVIDENCE

Principles

There are four general principles that are to be taken into account whilst preparing for the Entrance Check:

1. **Depart from your operational reality (which can differ from company to company);**
2. **Map your operational reality on the generic scoring card when looking into the control domains and control activities;**
3. **Build your evidence around the sustaining of your specific position on the scoring cards;**
4. **Call upon those people in your company who are best suited to answer the 5 generic questions that build the control chain and who can give input on your company's position on the scoring cards.**

Using these principles will enable you to identify your position and to reflect on it, and will ultimately provide you with the relevant evidence needed for the preparation of the entrance check in the most effective and cost efficient way.

3.1. DEPART FROM YOUR OPERATIONAL REALITY

This is by far the most important principle. The Entrance check does not require you to prepare and develop any specific kind of reports, documents or whatsoever, other than those you genuinely develop in running and maintaining control over your daily business with regard to the specific domains of the Charter.

As already said, the purpose of the Entrance check is to measure your current operational state of play in terms of achieving control over a set of predefined activities that are part of the CSP.

As such the Entrance Check does not depart from a predefined organisation. The reason for this is that there are several ways to obtain sufficient management control over a business.
They all make you eligible to join the Charter, provided they reach a specific minimum level of management control around a set of control activities.

That level depends on the combination of several building blocks:

- How the control activity is documented / integrated
- When the control activity is initiated (when does it run)
- How is the accessibility & modifiability of the control activity organised
- How is the communication and training on the control activity provided
- How is management overview and testing of this control activity organised.

As there are several ways of doing the above mentioned, it is important to focus on how your company maintains control when performing the Entrance Check.

3.2. MAP YOUR OPERATIONAL REALITY ON THE GENERIC SCORING CARD WHEN LOOKING INTO THE CONTROL DOMAINS AND CONTROL ACTIVITIES

The aforementioned building blocks constitute the scoring card. There are 5 scoring cards, depicting several possible positions you might find yourself in (see below).
For each control activity you will find yourself as a company in one of the situations depicted in the scoring cards, when reflecting on how you and your company deal with the control activities. Each of the combinations on the scoring card stands for a figure between 0 and 5. You will find back more detailed explanation about the building blocks under section 4 of this document.

The combination of these scores at control activity level will provide you with a fair picture of how your company is performing in terms of management control!

3.3. BUILD YOUR EVIDENCE AROUND THE SUSTAINING OF YOUR SPECIFIC POSITION ON THE SCORING CARDS

The only kind of evidence you need to provide is the one that supports your position on the scoring cards. In drawing conclusions the verifier will exert professional judgment as to what is sufficient, appropriate and reliable evidence.

When is evidence sufficient and appropriate?
It is up to you to explain why you claim a specific position on the scoring card. You will do this in showing to the verifier any kind of appropriate and sufficient evidence:

- 'Sufficient' is the measure of the quantity of verification evidence, and
- 'Appropriate' the measure of the quality of verification evidence provided.

The verifier's judgment as to what is sufficient and appropriate verification evidence is influenced by the following factors:

- The nature of the evidence;
- The control environment surrounding the data;
- The source of the evidence;
- The reliability of the supporting information available.

Consistent application of corporate procedures at site level must be proven in order to maintain your specific position on the scoring card.

When is evidence reliable?

The reliability of evidence is influenced by its source and nature. It is dependent on individual circumstances, but the following generalizations are a guide:

- Verification evidence from external sources is more reliable than that generated internally (for example confirmation received from an independent third party, e.g. external audit reports);
- Verification evidence generated internally is more reliable when the related control environment is effective;
- Verification evidence in the form of documents and written representations is more reliable than oral representations.
- Verification evidence is more persuasive when items of evidence from different sources or of a different nature are consistent. In these circumstances the verifier may obtain a cumulative degree of confidence higher than would be obtained from items of evidence considered individually.

Examples of evidence

A non-exhaustive list of examples of possible evidence that might support your position is listed below. These documents may be provided as evidence to the local verifiers in the Entrance Check verification procedure. Keeping the first principle in mind, the Entrance Check departs from your operational reality, these documents may prove to be appropriate and sufficient in some cases, yet not in others.

The verification evidence provided may include:

- Procedures (corporate level and/or local level)
- Auditing reports (internal and/or external)
- Inspection reports (public authorities / private / internal)
- Details of training programs, attendance lists to training, etc.
- Corporate procedures reinforced by site implementation evidence
- Quality manuals (e.g. ISO, BS, any other quality system, etc.)
- Information regarding accessibility, availability and adaptability of data and controls
- Reports of Internal Audits
- Reports on externally sourced audits (e.g. ISO 14001, EMAS, EFQM, OHSAS 18001, etc.)
- Periodic review reports
- Correspondence with / inspection reports from local, regional or national governmental bodies
- Reports on incidents and casualties (accidents, fires, leaks, etc.) and actions taken (follow-up reporting)
- Operational reports that refer to the control activity in place
- Any document related to investments on the implementation of a control activity / domain or CSP
- E-mails, faxes, and other correspondence

3.4. CALL UPON THOSE PEOPLE IN YOUR COMPANY THAT ARE BEST SUITED TO ANSWER THE FIVE GENERIC QUESTIONS AND CAN GIVE INPUT ON YOUR COMPANY'S POSITION ON THE SCORING CARDS

In order to define your position on the scorecards it is important to call upon those people that are knowledgeable of the controls in place in your organisation. As such you may choose to call upon people with an internal audit and/or controller function, other than or together with content input providers from a variety of functions (Procurement manager, OH&S manager, etc.).

4. THE SCORING FRAMEWORK AND THE LEVEL OF MANAGEMENT CONTROL PER CSP

4.1. THE SCORING FRAMEWORK

4.1.1. The Scoring Card

The ultimate calculation and translation of your specific position is done through a complex mathematical model: ***the scoring card***.
Each CSP contains a number of domains that are to be covered by the verification. Each domain is weighed against the other in order to reflect its relevance in relation to the CSP.

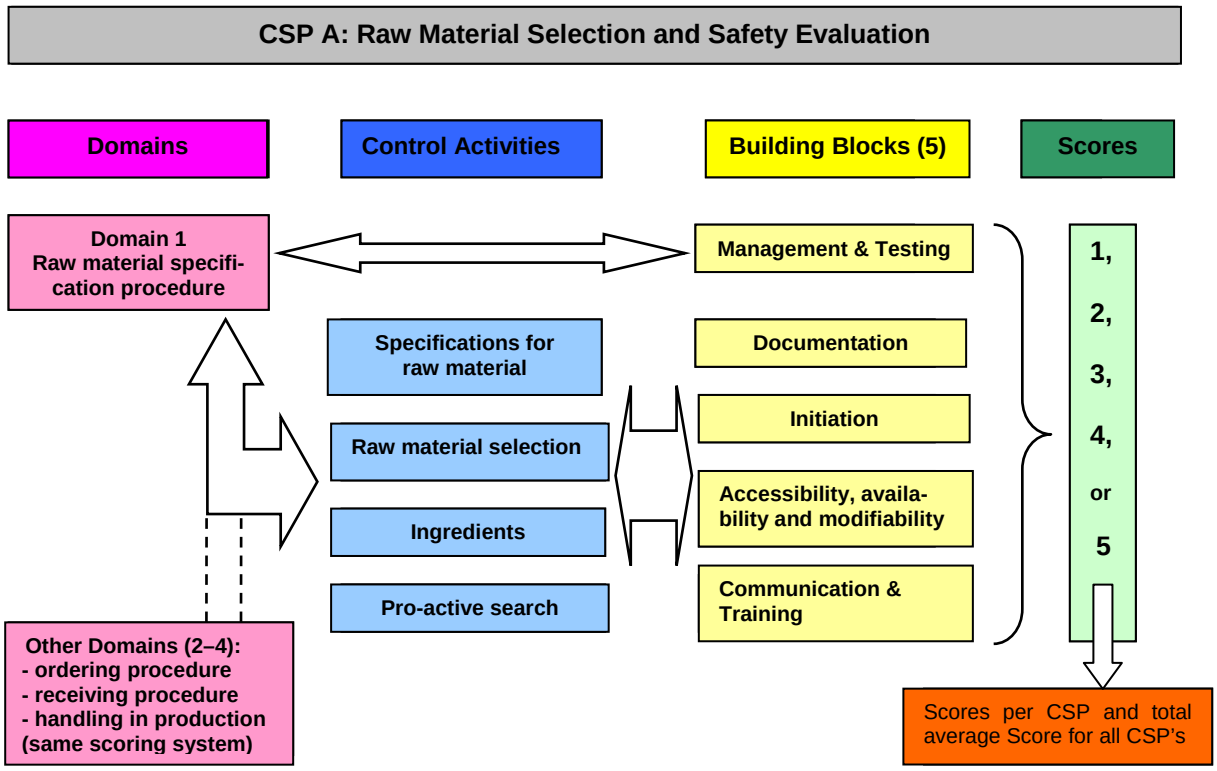
Each domain consists of a number of control activities that should be integrated in order to build and maintain management control. The measurement of the degree of integration of this control activity within the applicant company is done through scoring cards, focusing on five generic questions, each representing a typical management building block:

- How is the control activity documented / integrated
- When is the control activity initiated (when does it run)
- How is the accessibility & modifiability of the control activity organised
- How is the communication and training on the control activity provided
- How is management overview and testing of this control activity organised

By filling in the answers on each of these questions and checking the related evidence the Verifier will be able to assess whether the applicant company is meeting the minimum level for entering the Charter.
The performance of the applicant Charter participant on each control activity is reflected in a score (see table below) with each score indicating the level of effectiveness of the control system for the concerned activity. As described under section 4.2., all the scores of the control activities are aggregated at domain level and at CSP level, resulting in an overall score for the applicant company.

Effectiveness	Attributes	Measure	
Optimized	• Integrated internal control framework • Real time monitoring by management with continuous improvement • Automated tools used to make rapid changes	5	
Monitored	• Standardized controls w/ periodic testing for effectiveness with reported to management • Automation & tools used in a limited way to support control activities	4	
Standardized	• Control activities are designed and in place • Control activities have been documented & communicated to employees • Deviations from control activities will likely be detected	3	**Minimum Charter Entrance Level**
Informal	• Disclosure activities & controls are designed and present but not adequately documented • Controls mostly dependent on people • No formal training or communication of control activities	2	
Unreliable	• Unpredictable environment • Control activities not designed or in place	1	

The table below explains the links between the domains, the control activities, the building blocks and the scores (example of CSP A, Raw Material Selection and Safety Evaluation, domain 1, Raw material specification procedure).



4.1.2. The Scoring system

A total score per CSP is generated, based on:

- The averaging of the measurement per control activity (1 result per control activity)
- The averaging of these scores per domain (1 result per domain)
- Finally: the weighted averaging of the scores per domain, resulting in a final score per CSP

All scores are entered into the scorecard on the protected part of the Charter Extranet.

4.1.3. Levels of control – minimum score of 60% required

The final score on the scoring card per CSP corresponds with the following control levels:

- Level 1 = score of 20%
- Level 2 = score of 40%
- **Level 3 = score of 60%**
- Level 4 = score of 80%
- Level 5 = score of 100%

Although the scores might vary per control activity and also per domain a company has to score at least '<u>level 3</u>' (= <u>score of 60%</u>) or higher on <u>each</u> essential CSP in order to be admitted to the Charter.
A company that has been admitted to the Charter has to score within three years of admittance the same score (or higher) for the essential CSP's and each of the remaining CSP's.

NB: Remember that each CSP has to be applied to at least 50% of the total production output reported for the Charter area by the end of the first reporting year and 75 % by the end of the 3d reporting year, with a final objective to cover 100 % of the production output (see general reporting conditions and Key Performance Indicators).

4.2. MANAGEMENT CONTROL – FIVE BUILDING BLOCKS

As already explained, the level of management control depends on the answers on five generic questions, each representing a typical management building block:

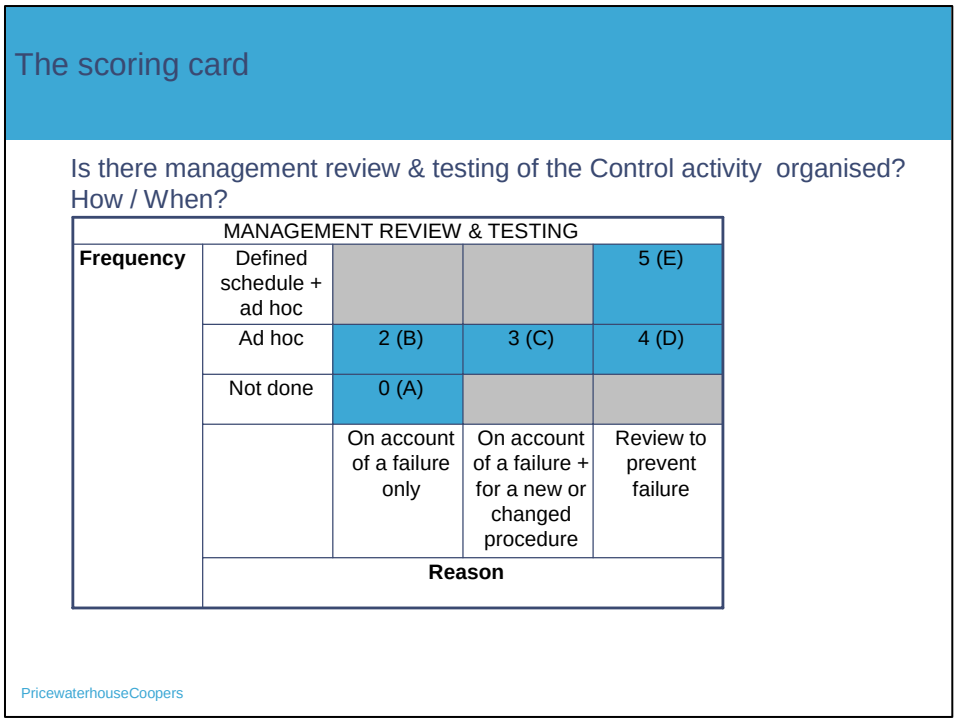
- How is the control activity documented / integrated
- When is the control activity initiated (when does it run)
- How is the accessibility & modifiability of the control activity organised
- How is the communication and training on the control activity provided
- How is management overview and testing of this control activity organised.

4.2.1. Management overview and testing of this control activity

As this question is only asked at CSP domain level (and not for each control activity) it needs to be answered first.

Each of the control activities should get a periodic review in order to be in control. Looking into the control activity based on a specific event or disaster that happened is working in a re-active mode and doesn't bring you control. Periodic review is necessary to be pro-active and be in control. When control activities are put in place, one needs to test if they are adequate. However, in order to be in control one needs to repeat the testing on a regular basis.

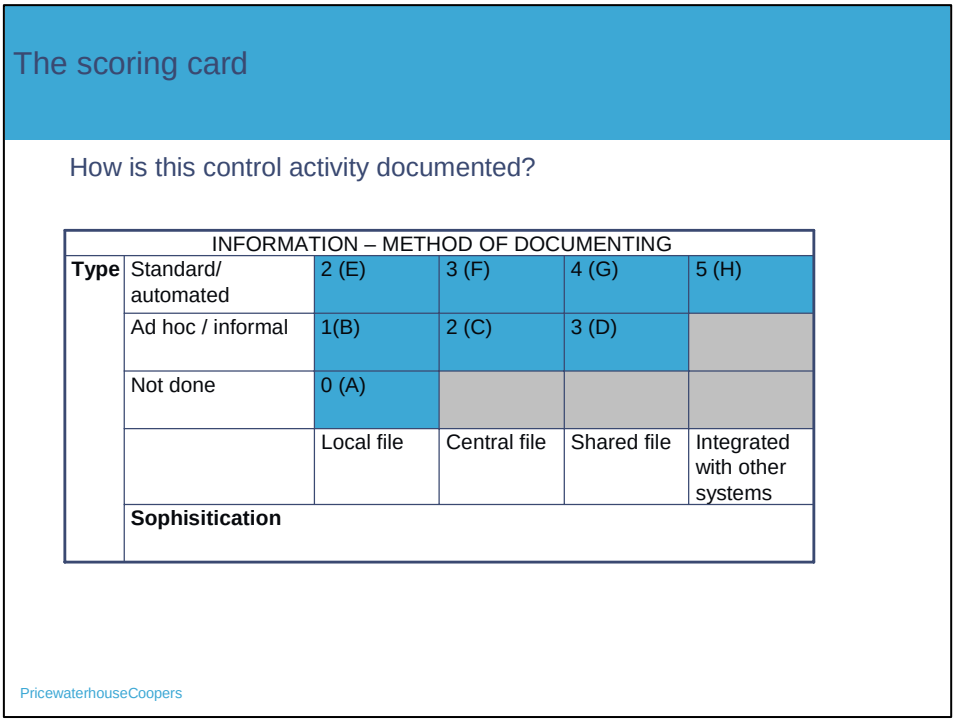
This regular basis can be while the control activity is normally performed, however when done in this way, it needs follow up and reporting. The highest score can be reached when testing is performed on a recurring basis and outside the regular use.



	Scoring options	Score
A.	Not done (0)	0
B.	Management review only undertaken ad hoc on account of a failure (2)	2
C.	Management review undertaken ad hoc on account of a failure or before the launch of a new or changed procedure (3)	3
D.	Management review undertaken ad hoc to prevent failure (4)	4
E.	Management review undertaken by regular review on a defined schedule + ad hoc update (5)	5

4.2.2. Documentation of the control activity

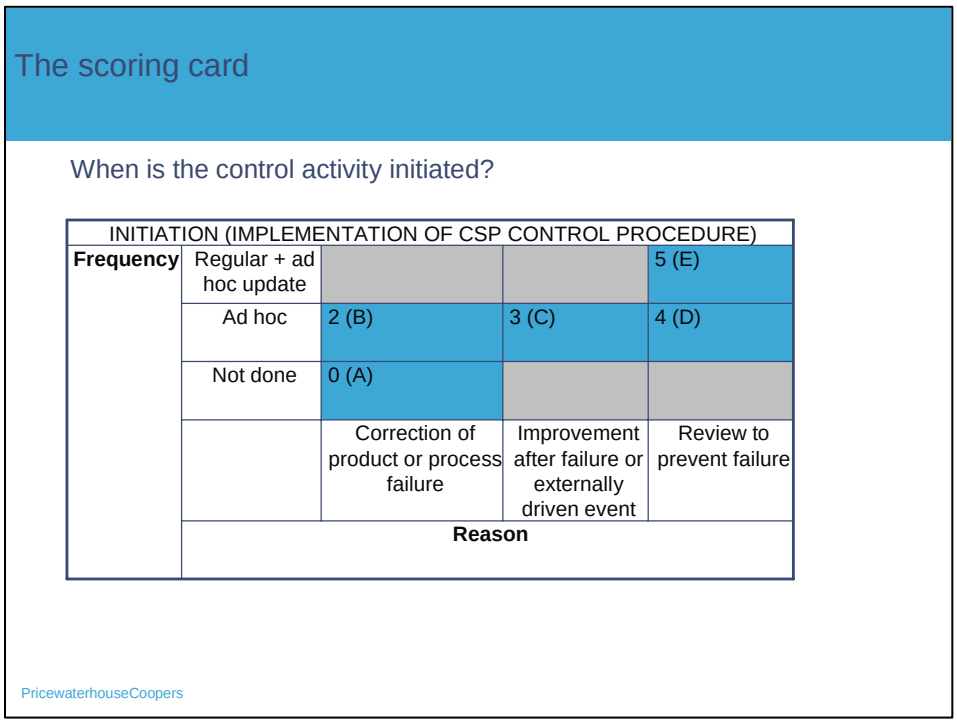
The control activity documentation involves whether the control activity is captured in a written procedure, an automated system or a manual system. If the control activity is not documented at all it is obvious that you are not in control and your score is zero. Having a person in the organization that knows perfectly what the control activity is about but not having anything documented does not put you in control. The scores are gradual and go up in function of the automation. If your manual procedure is supported by, for example a tool like access or excel you will score 3. Fully integrated, real time systems give you the highest score of 5, but this high level of automation is not necessary to have full control and which can be realized by combining easier tools and procedures.



	Scoring options	Score
A.	No records/no documentation	0
B.	Informal non-standardized or non-structured documentation with one copy available to one person (1)	1
C.	Informal non-standardized or non-structured documentation with one copy available in a central location (2)	2
D.	Informal non-standardized or non-structured documentation with copies made available to all concerned (3)	3
E.	Specially designed documentation for the purpose with one copy available to one person (2)	2
F.	Specially designed documentation for the purpose with one copy available in a central location (3)	3
G.	Specially designed documentation for the purpose with copies made available to all concerned (4)	4
H.	Specially designed documentation for the purpose integrated with other automated management systems (5)	5

4.2.3. Initiation of the control activity

A control activity is only relevant when it is alive in your activities. The level of being alive will therefore depend on the frequency and the reason for which it is activated ("initiation"). When a certain control activity is activated on a periodic basis, whatever the reason might be, you are under control as you are performing a regular review. If you wait until an event happens that should have been taken care of by the control activity, you are not in control: you work in a re-active mode instead of in a pro-active mode. The highest score is realized when you actively and on a regular basis perform the control activity.

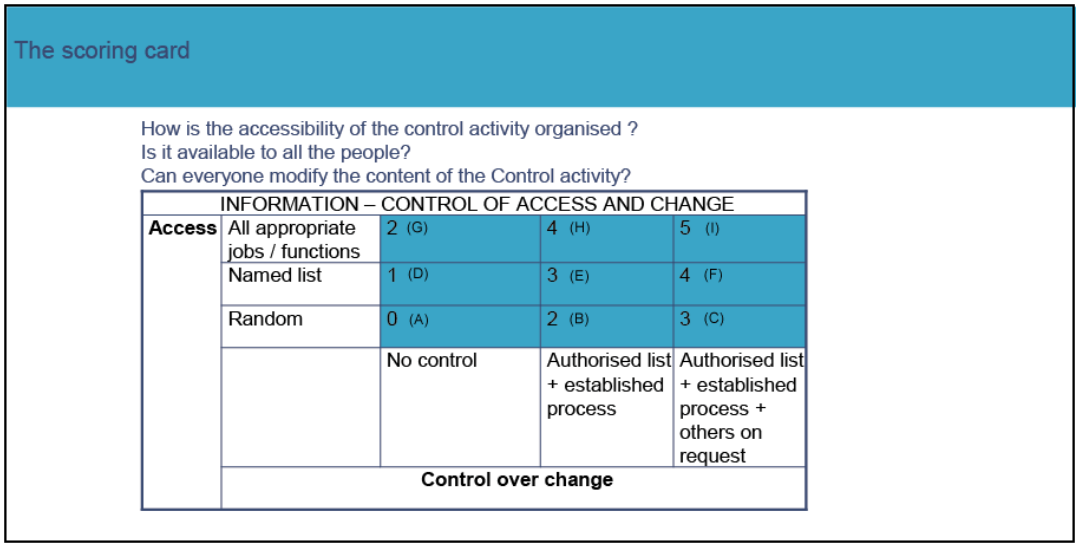


Scoring options	Score	Score
A.	Control activity not undertaken (0)	0
B.	Carried out only to correct product or production process following a failure (2)	2
C.	Carried out only to improve processes following externally driven event (3)	3
D.	Carried out as normal part of process governed by ad hoc review not driven by event (4)	4
E.	Carried out as normal part of process governed by regular review, improvement to prevent failure + ad hoc update (5)	5

4.2.4. Accessibility and modifiability of the activity control

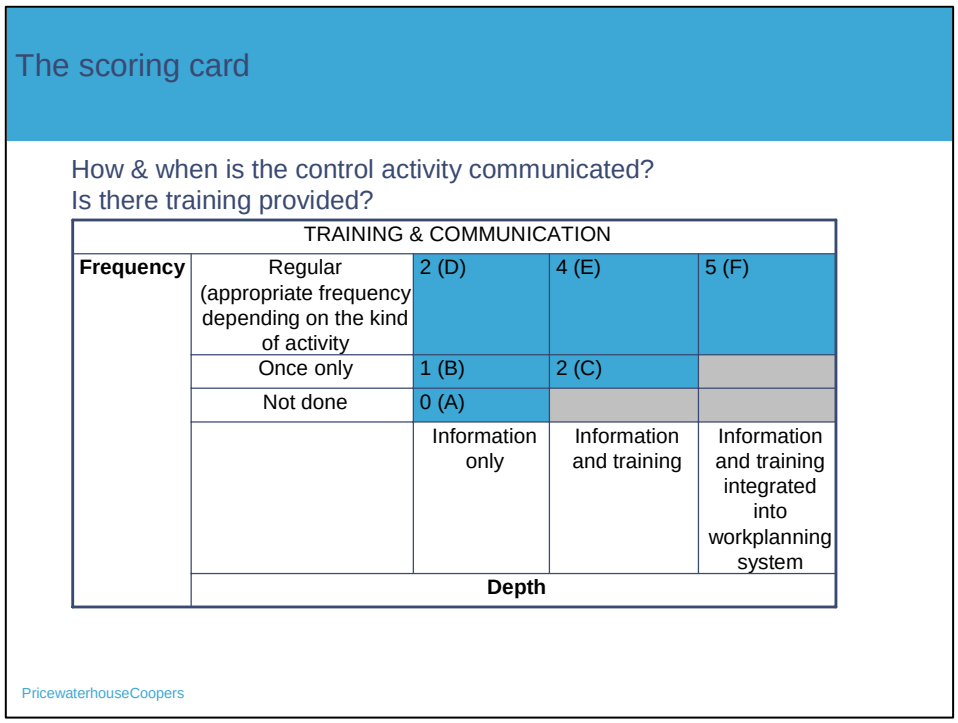
A control activity that can be read by anyone provides information to all relevant stakeholders. The higher the transparency, the better control is established. In the event the reading access is restricted, information carrying becomes out of control. A control activity that can be modified by anyone in your organization results in a control activity that is "out of control". It is obvious that modifications of control activities should be restricted to those people who should be given this access in view of their function in the organization. This restricted access should go together with a periodic review in order to be completely under control. If you allow changes (although by authorized people) at any given time without a formal procedure, you are not in control either.

	Scoring options	**Score**
A.	Random access - non-existent or non-structured process for changing the information(0)	0
B.	Random access - established process for authorised people to change the information (2)	2
C.	Random access - established process for authorised people to change the information + changes documented (3)	3
D.	Named access list - non existent or non-structured process for changing the information (1)	1
E.	Named access list - established process for authorised people to change the information (3)	3
F.	Named access list - established process for authorised people to change the information + changes documented (4)	4
G.	All appropriate jobs/functions have access - non-existant or non-structured process for changing the information (2)	2
H.	All appropriate jobs/functions have access - established process for authorised people to change the information (4)	4
I.	All appropriate jobs/functions have read access - established process for authorised people to change the information + changes documented (5)	5



4.2.5. Communication and training on the control activity

Having control activities, but not actively communicating them to the people in your organization, does not support you in having control. In order to be in control you need to train people in control activities and actively update them on changes. The highest status of control you can reach is when people are trained and actively and periodically monitored in order to check if they are fully aware of what is expected from them with regard to the control activity.



	Scoring options	Score
A.	None (0)	0
B.	Information provided once (1)	1
C.	Information provided regularly (2)	2
D.	Information and training provided once (2)	2
E.	Information and training provided regularly (4)	4
F.	Information and training integrated into work planning system (5)	5

4.3. BREAKDOWN PER CSP

Each CSP consists of two or more domains and a set of control activities per domain.

The issue relative to the management overview and testing - the first building block - is raised at the general level of the CSP domain, not at the control activity level. It is considered that the management overview and testing should take place in the same way for all the control activities within a CSP.

Besides this, each control activity has to be examined from each of the four other building blocks, i.e. documentation, initiation, accessibility and modifiability and training (see also the table on page 6, the example of CSP A on Raw material selection and safety evaluation)

During the entrance check process, the verifier will need to consult documents or systems that companies use to manage the control activities at the various stages.

The table here under provides you with a summary of some interesting guidelines and content information per **essential CSP** that might help you to prepare the Entrance Check.

Charter Sustainability Procedure	Content resources
CSP A: **Raw material selection, including safety evaluation of raw materials**	**Raw Material Selection** Work to continually improve, balanced across the three sustainability pillars (social, economic and environmental) by: 1. Setting and reviewing specifications for individual raw materials that seek to optimise sustainability by ensuring efficient and reliable processing and formulation into products. 2. Selecting raw materials in a way that looks to: a. Control any risks identified through Raw Material Risk Assessment, e.g. by reducing use of such materials. b. Manage risks to human health or the environment, for example by favouring ingredients: i. where the margins of safety are wide ii. which are readily biodegradable iii. which are less likely to bio-accumulate 3. Companies shall consider, on a case-by-case basis bearing in mind life-cycle management principles, opportunities to use: a. specific recycled materials where these are available. b. specific renewable raw-materials.
	Raw Material Safety Evaluation Progressively and systematically perform or otherwise obtain appropriate safety evaluations for relevant raw materials used in products. Safety evaluations will evaluate risks to: ▪ human health, for the consumer use phase, including intended use and considering foreseeable misuse, including accidents; ▪ the environment, considering significant compartments for release during and after consumer use.
	Examples of Existing Legislation, Standards, Procedures and Systems ▪ Principles of the HERA approach and the EU Technical Guidance Document in relation to EU Directive 793/93. ▪ Safety evaluation from suppliers or through collaborative networks. ▪ ECETOC Risk Assessment web tool. ▪ …

Charter Sustainability Procedure	Content resources
CSP D: **Resource Use**	**Overall Control and management** Establish and maintain control arrangements that seek to continually improve sustainability, balanced across the three sustainability pillars by using more efficiently the four key resources used in their own or other production process and in the use of their products: ▪ Energy ▪ Water ▪ Raw materials and ▪ Packaging
Charter Sustainability Procedure	**Content resources**
CSP E: **Occupational Health and Safety**	**Overall Control and management** Establish, document, implement, maintain and continually improve an occupational health and safety management system (OHSMS) in relation to their manufacturing activities. The OHSMS, which will be appropriate to the nature and scale and occupational health and safety impacts of their activities, products and services; will ensure that: ▪ Hazards arising from and within their manufacturing activities that may have a significant impact on occupational health and safety are identified and risk assessments made; ▪ Significant occupational health and safety risks that are identified are eliminated or controlled effectively; ▪ Emergency situations and potential accidents that may impact occupational health and safety have been identified, procedures to prevent or mitigate such impacts are in place, and these are periodically tested and reviewed; ▪ Senior management review takes place at planned intervals and assesses opportunities for improvements and changes to the system and to objectives and targets.
	Examples of Existing Legislation, Standards, Procedures and Systems ▪ OSHA 18000, ISO 14001 ▪ Plan, Do, Check, Act sequence ▪ Manufacturer's Safety Data Sheets (MSDSs) ▪ A.I.S.E. "Guidelines for the Safe Handling of Enzymes in Detergent Manufacture ▪ ….

Charter Sustainability Procedure	Content resources
CSP F: **Manufacturing Environmental Management System**	**Overall Control and management** Establish, document, implement, maintain and continually improve an environmental management system (EMS) in relation to their manufacturing activities. The EMS, which will be appropriate to the nature and scale and environ-mental impacts of their activities, products and services, will ensure that: ▪ Significant environmental aspects of the Company's operations that may adversely impact the environment are identified; ▪ Objectives and targets are set and documented, a programme to achieve those objectives and targets is in place, and roles and responsibilities are defined and documented; ▪ Relevant employees are trained, competent for the tasks they perform, and aware of the consequences of failures; ▪ Operations that are associated with identified significant environmental aspects are planned to ensure they are carried out under specified conditions; ▪ Emergency situations and potential risk areas that may impact the environment have been identified and procedures to prevent or mitigate associated environmental impacts are in place, and periodically tested and reviewed; ▪ Procedures are in place to: o Monitor and measure the identified, significant environmental aspects, regularly o Periodically evaluate compliance with legal and other relevant requirements o Control non-conformities and take corrective and preventive actions o Maintain appropriate records ▪ Senior management review takes place at planned intervals and assesses opportunities for improvements and changes to the policy, the system and objectives and targets.
	Examples of Existing Legislation, Standards, Procedures and Systems ▪ ISO 14001 ▪ EMAS ▪ Plan, Do, Check, Act sequence ▪ …

Charter Sustainability Procedure	Content resources
CSP H: **Product recall system**	**Overall Control and management** Establish and maintain control arrangements for the recall of products that have been distributed in the event that faults become evident. These arrangements will ensure that: ▪ criteria are defined and communicated to all relevant personnel to require them to raise an alarm with designated persons should a fault that may require a recall be discovered; ▪ suppliers understand their duty to notify the Company, and have appropriate contact information, should they become aware of faults that may cause the Company's products to pose a risk, cause gross dissatisfaction or be unacceptable in terms of legal compliance; ▪ the Company responds quickly and decisively to manage any required product recall so as to minimise or eliminate: o danger or risk to consumers and the local community o risk to customers or other trade partners o risk to employees o risk to the company's reputation and its shareholders ▪ suspect and retrieved stock can be securely isolated until disposal arrangements are in place.
Charter Sustainability Procedure	**Content resources**
CSP I: **Finished Product Safety Evaluation**	**Overall Control and management** Establish and maintain control arrangements for the safety evaluation of their products to ensure that they are safe for consumers / customers to use. The safety evaluation should include optional devices and/or personal protection equipment to reduce exposure to the (end) user. This requirement supplements the safety evaluation of individual ingredients (CSP A), and addresses the safety of the formulated product including its physical form, its mode of use and its packaging. The safety evaluation shall, before the product is put on the market: a. evaluate the safety of the product in terms of foreseeable misuse and accidents as well as intended use; b. verify that the product has been appropriately classified, labelled, and where applicable packaged, in accordance with the relevant transport regulations
	Examples of Existing Legislation, Standards, Procedures and Systems ▪ Dangerous Preparations Directive ▪ AISE Guidelines on Classification and Labelling, Sensible Use information following the A.I.S.E. Guidelines ▪ Material Safety Data Sheet (I&I) ▪ ….