



## Public sector suppliers demonstrate their commitment to responsible procurement in their PPE supply chains

A Channel 4 [investigation](#) revealed significant human rights abuses in the supply chain for the production of personal protective equipment (PPE); these abuses include poor working conditions, low pay, poor conditions in accommodation facilities and unacceptable working hours.

LUPC approached those suppliers providing PPE under three framework agreements: Laboratory Consumables, Chemicals, Office, Computer & Library Supplies, and PPE. We asked them to confirm how they work with their supply chain to understand, mitigate, and eliminate risks and to inform us if they sourced products from those named in the investigation; Polyco Healthline, and/or Top Glove. Whilst Ansell was not mentioned specifically in the investigation, they have been identified in the news in the past including a [US ban in 2019](#) for allegations of forced labour, so we also included them in our checks.

Of the 13 suppliers we contacted, we received nine responses. Most of the suppliers were aware of the investigation and demonstrated good practice by telling

us about their approaches in this area including where they source from.

Suppliers including Arco, Direct Corporate, Lyreco and Starlab all provided information on the processes they have in place to monitor their suppliers, as well as details of the external organisations they work with to verify the information they receive, particularly [SEDEX](#) and the [Ethical Trading Initiative](#) (ETI).

Arco confirmed that they do procure products from Top Glove and that they were aware of previous similar concerns, which they addressed with the involvement of the ETI. Arco has been a member of the ETI for over 10 years and has a dedicated section on their [website](#) to address ethical practices.

Direct Corporate (DCC) procure from Polyco Healthline; they utilise self-assessment for UK/EU suppliers with independently verified external

audits, by SEDEX, [WRAP](#) or [BSCI](#). DCC shared their policies, the self-assessment questionnaire from their sister



company, Orbit International, and also relevant policies from Polyco themselves.

Lyreco confirmed that they procure from Ansell and detailed their auditing process which again is supported by recognised bodies. Lyreco signed the [UN Global Compact](#) in 2004, which requires supporters to adhere to the [SA8000 standards](#), and undertake social audits with their own trained staff. They have also selected [SMETA](#) as a valid standard for social audits.

Starlab reported that it is a distributor of Ansell gloves. They shared their code of conduct and an [ILO](#) (International Labour Organisation) Compliance certification for Starguard products. Starlab assured us that they carry out checks to ensure employment practices in factories do not infringe on human rights.

Staples confirmed they procure via Top Glove and shared their corporate responsibility report and responsible sourcing initiatives, which include social and factory audit and annual re-audits to ensure suppliers remain compliant. Whilst Banner has a team in China, who routinely visit factories and check for compliance, they also insist on formal third-party audit reports such as SEDEX or BSCI, every two years. Arden Winch reported to buy from Polyco Healthline.

Staples, Banner and Arden Winch shared with us the same official response from Polyco Healthline, where they recognise the issues presented in the documentary. The statement stated that the Malaysian Ministry of Health carried out an audit to Top Glove in May this year, with a 'very satisfactory' compliance with the COVID-19 Movement control Order guidelines. Polyco confirmed they hold LSAS (Labour Standards Assurance System) Level 2 and LSAS Level 3 certifications, with Level 2 being a mandatory requirement for supplying the NHS.

Appleton Woods focus their glove supply on the Shield Scientific range of PPE gloves, whose manufacturing and supply chain operation is well understood and whose

working conditions are known to be satisfactory. It is important to note that Appleton Woods collaborated with LUPC to carry out an audit of Shield Scientific in Malaysia in 2018. You can find the full case study [here](#). Although not currently supplying gloves from Polyco Healthcare and Ansell, Appleton Woods has previously supplied these brands to meet customers' specific requirements and they are suppliers managed within the company's audited Quality Management System.

LA Safety and LA Clothing informed they do not work with any of the manufacturers mentioned.

Hard Edge reported they have not sourced any product or worked with products from the companies mentioned. They provided a [link](#) to their relevant policies.

Office Depot confirmed that it has not sourced anything from the suppliers mentioned above. They explained that their PPE is sourced in compliance with their Social Compliance Program, which creates transparency in the assessment of suppliers and has a specific aspect that looks at working conditions. Office Depot shared their modern slavery statement, their corporate social responsibility brochure and their supplier guiding principles.

Camlab, CMT Group and Trinity Workwear have not yet responded to our request.

Many organisations are looking to procure PPE for their staff and/or customers; for some of them this may be the first time buying these products and they may be unfamiliar with technical requirements, certifications, supply chain structures and responsible business practices. However, the obligation for public buyers to procure responsibly is no different in the case of PPE.

Public buyers must keep up their efforts to ensure they maintain human rights due diligence in their supply chains. Seeking visibility of the processes from factories you are sourcing from and obtaining available health and safety risk assessments from those factories is advised. It



is important to continually engage with your suppliers and work proactively with them to improve their workers' conditions. If you do discover an issue, do not walk away from the problem, seek advice in order to resolve the problem.

LUPC recognises the progress some suppliers have made towards eliminating labour risks in their supply chain but also that there is much more that can be done to bring about change. We will continue working with our suppliers in this important area and will keep our members updated on any developments.

For more information please contact Marisol Bernal, Category Manager Responsible Procurement. [m.bernal@lupc.ac.uk](mailto:m.bernal@lupc.ac.uk)

#### **Glossary:**

**SEDEX (Supplier Ethical Data Exchange):** A not for profit, membership organisation dedicated to improving ethical and responsible business practices in global supply chains. Their online database enables businesses to share ethical data, including ethical audit reports, with their customers.

**SMETA:** developed by Sedex, is an ethical audit procedure that combines the best practices in the field of corporate social responsibility. The concept describes a methodology based on the Ethical Trading Initiative (ETI) [Base Code](#). Audits in the SMETA format focus as much on labour conditions and occupational safety as on environmental standards and ethical business practices.

**ETI:** It is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe.

**WRAP (Worldwide Responsible Accredited Production):** it is a certification programme for manufacturers of clothing, footwear, and other sewn products. The WRAP programme certifies facilities for compliance with the 12

Principles which assure safe, legal, and ethical manufacturing processes.

**BSCI (Business Social Compliance Initiative):** is an initiative of the Foreign Trade Association (FTA), the leading business association of European and international commerce that brings together over 1,500 retailers, importers, brands, and national associations to improve the political and legal framework for trade in a sustainable way. BSCI support member companies to integrate social compliance at the heart of their global supply chains.

**SA8000 standards:** A social certification program which provides a holistic framework allowing organizations of all types, in any industry, and in any country to demonstrate their dedication to the fair treatment of workers. It is based on internationally recognized standards of decent work, including the Universal Declaration of Human Rights, ILO conventions, and national laws.

**Marisol Bernal, Category Manager Responsible Procurement.**

