



CLEANING
ACCOUNTABILITY
FRAMEWORK

Public consultation on the National Action Plan to combat modern slavery 2020-24

Submission by the Cleaning Accountability Framework

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About the Cleaning Accountability Framework (CAF)

CAF is an independent, multi-stakeholder initiative that seeks to improve labour standards in the cleaning industry in Australia. CAF promotes the rights of cleaners, responsible contracting practices, and transparent supply chains. We do this through the CAF Certification Scheme, recognising and rewarding good practice in the cleaning industry.¹ We work with all supply chain stakeholders to identify, remedy and prevent labour rights abuses. CAF has been recognised as an anti-slavery mechanism by leading business and human rights experts for the work we do in relation to worker-driven compliance, robust third-party auditing, and tripartite collaboration and education.

CAF was founded in 2013 by AustralianSuper, the United Workers Union, and a coalition of industry leaders that included the Fair Work Ombudsman, property owners, building managers, and cleaning contractors who shared the common aim of protecting cleaners from exploitation and driving responsible contracting practices in the cleaning industry. Over a four-year development period, these stakeholders developed a multi-stakeholder organisation, CAF, and a mechanism to achieve these goals: a star rating system for buildings where cleaning services are procured and delivered responsibly and in accordance with cleaners' right to decent work.

The CAF [Core Principles](#), the CAF 3 Star Standard, the CAF Pricing Schedule (a mechanism to bring transparency and accountability to contract pricing), and CAF's unique worker engagement model were derived through our stakeholders' collaborative efforts. CAF certification was piloted in 13 buildings over a two-year period in 2017 and 2018. CAF certification for commercial office and retail mall buildings was launched in March 2019. CAF has now awarded a 3 Star rating to 20 buildings nationally and we are continuing to expand into new areas such as retail stores.

¹ <https://www.cleaningaccountability.org.au/certification/>

The Cleaning Accountability Framework's partners

The following organisations on CAF's Advisory Group endorse this submission:



Executive summary

The Cleaning Accountability Framework (CAF) welcomes the opportunity to make a submission to the Australian Government's consultation paper on the National Action Plan to combat modern slavery 2020-24.

CAF is at the forefront of innovation to tackle modern slavery risk in Australia and has a proven track record in uncovering and remediating labour rights violations experienced by cleaners and ensuring that the conditions for decent work are in place in buildings across Australia.

CAF works with stakeholders across the cleaning supply chain to implement measures to mitigate modern slavery risk, to improve transparency and accountability in contracting practices, to promote responsible business practices, and to empower cleaners to speak up.

A CAF Star rating on a building provides assurance to investors, building owners and their tenants that cleaning services at that building are being procured, managed, and delivered in a manner that foregrounds respect for cleaners' labour rights.

CAF recommends that:

- ⇒ **The Australian Government introduce CAF requirements for Commonwealth leased office property.**

Implementing this procurement rule will lift labour standards for cleaners Australia-wide, providing a powerful form of protection against modern slavery to tens of thousands of vulnerable workers. It will also send a strong signal to the market that compliance with labour standards is non-negotiable when conducting business with Government. Such a commitment will assist the Australian Government to "protect against human rights abuses by third parties, including business" as per the State duty prescribed by the UN Guiding Principles on Business and Human Rights.²

CAF would welcome the opportunity to work with the Australian Government to slavery-proof contract cleaning in Government buildings.

For further information on this submission, please contact Dr Miriam Thompson via miriam@cleaningaccountability.org.au

² Human Rights Council (2008) *Protect, Respect and Remedy: a Framework for Business and Human Rights*. <https://www.business-humanrights.org/sites/default/files/reports-and-materials/Ruggie-report-7-Apr-2008.pdf>

Modern slavery in the cleaning industry in Australia

Cleaning has been recognised as a key risk area for modern slavery in Australia by the Department of Home Affairs.³ Withholding of wages, immigration-related coercion and threats, deceptive recruitment, excessive overtime, debt bondage, confiscation of personal and travel documents, and dangerous and substandard working conditions are all practices that are found in the cleaning industry in Australia.⁴

These practices start at the point of procurement, with tender processes that encourage undercutting resulting in contracts being awarded at prices that do not allow for payment of minimum wages and entitlements and safe working limits.

In the estimation of a former cleaner who now works for the United Workers Union (one of CAF's founding partners) "Every [migrant] cleaner I know has been threatened, explicitly or implicitly, on the basis of their immigration status."⁵ In many instances, the visa breaches which enable employers to obtain disproportionate power over migrant workers have occurred as a consequence of pressure and coercion applied by employers themselves. A very common scenario will be for an international student, who is permitted to work 40 hours a fortnight under the terms of their visa, to be pressured into covering additional shifts in order to replace a fellow worker who is sick. Once a migrant worker agrees to 'help out' his or her friend in this way, they become highly vulnerable to wage exploitation from the employer, because any complaint they may make about unlawful work conditions can be met with the threat that they will be reported to immigration authorities.

It is difficult to achieve justice for workers in cases like these because of the high evidentiary threshold, expense, difficulty and length of prosecution, and the precarious migration status of those involved. Typically, workers who have been exploited in Australia will simply return to their country of origin, with no remedy or compensation for their suffering or lost wages, and without any prosecution or significant penalty paid by their employer or the entity benefiting from their labour.

The egregious exploitation of cleaners has been highlighted in reports by the Fair Work Ombudsman, the cleaners' union, the United Workers Union (formerly United Voice), academic researchers, and the media for well over a decade now.

Cleaners working in government-occupied buildings have not been exempt from this.

³ *Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities*, accessible at: <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

⁴ Doherty, Ben (2017) 'Sydney cleaning firm treated foreign workers as 'slaves', court says', *The Guardian*, 8 June 2017, accessible at: <https://www.theguardian.com/australia-news/2017/jun/08/sydney-cleaning-firm-treated-foreign-workers-as-slaves-court-told>

⁵ United Voice (now United Workers Union) (2017) Submission to the Parliamentary Inquiry of the Joint Standing Committee on Foreign Affairs, Defence and Trade on Establishing a Modern Slavery Act in Australia, accessible at: <https://www.business-humanrights.org/sites/default/files/Sub%20116%20%281%29%20united%20voice.pdf>

How CAF addresses modern slavery risk

1. A multi-stakeholder industry-based initiative

The strength of CAF to address modern slavery in the cleaning industry begins with our tripartite coalition of business, government, and civil society.

CAF is a multi-stakeholder organisation made up of business, government, union and academic representatives. We currently work with around 30 stakeholders including: AustralianSuper, AiGroup, AMP Capital, BIC Services, CBRE, Cbus Property, Charter Hall, Downer Group, the Fair Work Ombudsman, ISPT, ISS, JLL, the Property Council of Australia, the United Workers Union, the Centre for Business and Social Innovation (UTS), the Victorian Department of Treasury and Finance, and Woolworths.

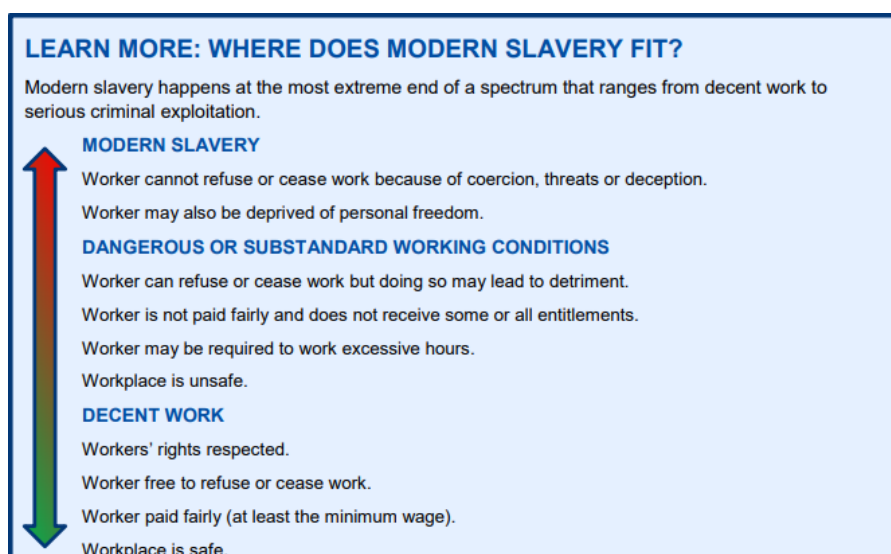
CAF's tripartite multi-stakeholder composition affords us the requisite buy-in and expertise from stakeholders across the cleaning supply chain, from investors, property owners, building managers, cleaning contractors, to cleaners themselves. The Fair Work Ombudsman, State-based portable long service leave authorities, and the Victorian Department of Treasury and Finance also bring significant expertise and authority to the work we do. The United Workers Union provides insight into the lived experience of cleaners and amplifies the voice of cleaners within CAF. Expertise from our academic research partners at the Centre for Business and Social Innovation at UTS, and industry organisations such as the Property Council of Australia and the Building Services Contractors Association of Australia also ensure the continual development and refinement of CAF's rating framework and are critical to its broader uptake.

CAF stakeholders work together collaboratively and in good faith to promote the rights of cleaners and responsible business practices in the industry.

2. Tackling modern slavery through the promotion of decent work

CAF's approach to addressing modern slavery is founded on the promotion of decent work. The CAF Star Standard is based on minimum legal standards relating to wages and entitlements, safe and secure work, respect in the workplace, and freedom of association.

The infographic below situates decent work on the continuum of exploitation that encompasses modern slavery and dangerous or substandard working conditions.



CAF works with supply chain stakeholders at a building to identify, investigate and remedy dangerous or substandard working conditions. CAF's assessment of working conditions at a building also includes a process to diagnose the presence of slavery-like practices through worker engagement.

A CAF rating is awarded when the conditions for decent work are implemented.

3. A rating scheme to reward the responsible procurement and management of cleaning services

CAF has developed a national rating that assesses labour rights compliance at buildings. Unique to CAF, this involves consultation with cleaners both as part of the audit process, and for ongoing monitoring of compliance at the site. CAF and our partners recognise that worker voice is critical to mitigating the risk of exploitation and modern slavery, and the United Workers Union plays a practical role in CAF's worker engagement process.

CAF currently assesses buildings to a 3 Star Standard which provides assurance that, at a minimum, cleaners are receiving their legal rates of pay and entitlements, have safe working conditions, improved job security at change of contract, and that businesses in the supply chain at that building are meeting their legal obligations. The CAF Star Standard has been developed over years of consultation with a broad range of stakeholders and incorporates specific CAF tools that bring transparency and accountability to procurement practices.

CAF takes an educative approach to compliance. In an effort to better support stakeholders, CAF has developed guidance and training in the following areas:

- Property manager oversight of contractor compliance with labour standards,
- CAF best-practice model policies (e.g. personal/carer's leave policy, right to work checks, paid induction procedures etc.),
- Investigation and remediation of identified compliance issues, including preventative measures, and
- Training and support for cleaners to identify and report labour rights violations.

It is intended that the CAF rating framework will result in industry-wide responsible contracting, including a set of procurement standards and compliance mechanisms that will apply across the property services sector in Australia.

In order to facilitate larger scale adoption of CAF certification in the built environment, CAF is in the process of refining a Prequalification scheme for cleaning contractors. CAF Contractor Prequalification is awarded to contract cleaning companies that have adequate management systems in place at a policy and procedure level to support compliance with the CAF 3 Star Standard. CAF building certification will be streamlined when CAF-prequalified contractors are used, due to the documentation check that has already taken place as part of the prequalification audit. Following a first pilot, through which three companies were prequalified, we are undertaking a second pilot to refine the assessable components and audit procedures. We expect to launch to CAF Contractor Prequalification to market later in 2020.

4. Worker education and engagement

CAF places worker education and engagement at the heart of what we do. Cleaners are meaningfully involved from the point at which a building is nominated for CAF certification, and throughout the three-year certification period.

Our worker engagement method includes conducting paid time meetings with all cleaners, a worker survey, and cleaners nominate a CAF Representative to represent the cleaning workforce at the building within CAF. The CAF Representative receives training and support from CAF and the United Workers Union to equip them with the knowledge and skills required to monitor labour standards at their workplace and to assist their peers to raise issues with the employer, and if need be, up the supply chain, when they occur.

CAF's approach to worker engagement *works*: cleaners are speaking up, and where violations of their rights have occurred, effective remediation is taking place and preventative mechanisms are being implemented.

CAF is also collaborating with the Centre for Business and Social Innovation at the University of Technology Sydney to develop a worker app for cleaners in CAF-certified buildings that will provide an additional avenue for worker education and engagement and a pathway to report issues.

How the Australian Government can address modern slavery risk in outsourced cleaning services

As both a landlord and tenant of buildings that are cleaned by a workforce that is vulnerable to exploitation and modern slavery, the Australian Government has a key role in ensuring that cleaning services are procured responsibly, and that adequate oversight of outsourced cleaning services is maintained.

By introducing CAF requirements in Commonwealth leased office property, the Australian Government would send a strong signal to the market that compliance with labour standards is non-negotiable when conducting business with Government. Such a commitment will assist the Australian Government to “protect against human rights abuses by third parties, including business” as per the State duty in the UN Guiding Principles on Business and Human Rights.⁶

The table below highlights how CAF addresses modern slavery risk and can assist the Government to meet its responsibilities in this area.

Risk area	How CAF addresses this	How this addresses Government priorities
Modern slavery	<ul style="list-style-type: none"> • Worker engagement to identify indicators of forced labour, debt bondage, and coercion and threats related to immigration status. • Worker engagement to enable cleaners to raise compliance issues relating to dangerous or substandard working conditions that can lead to slavery-like practices as defined in the Criminal Code. • Supply chain transparency and accountability. • CAF can refer potential modern slavery victims to specialist non-government service providers who can offer targeted assistance. 	<ul style="list-style-type: none"> • Risk mitigation of modern slavery occurring at Government buildings. • Demonstrated implementation of measures to prevent and remediate modern slavery and dangerous or substandard working conditions. • Oversight of supply chain risks. • Victim identification.

We would welcome the opportunity to work with the Australian Government to slavery-proof contract cleaning in Government-owned and tenanted buildings.

To better understand how CAF addresses labour rights violations, please see the CAF underpayment case study included as an [appendix](#) to this submission.

CAF Recommendation

⇒ **The Australian Government should introduce CAF requirements for Commonwealth leased office property.**

⁶ Human Rights Council (2008) *Protect, Respect and Remedy: a Framework for Business and Human Rights*. <https://www.business-humanrights.org/sites/default/files/reports-and-materials/Ruggie-report-7-Apr-2008.pdf>

CAF responses to the consultation questions

1. Do the 12 goals capture key areas of focus for Australia over the next five years?

We consider the 12 goals appropriate areas of focus for Australia over the next five years.

2. Should there be additional goals to address other areas of focus, emerging issues or trends? If so, what should they be?

There are two additional interrelated areas we recommend to form part of the National Action Plan's goals:

⇒ **Worker engagement in the prevention of modern slavery**

While goal 3 explicitly mentions supporting, protecting and empowering victims of modern slavery, we argue there is a lack of recognition of the critical role that workers themselves play in preventing modern slavery. Workers, and in particular vulnerable workers, should be supported, protected and empowered to work with dignity, free from exploitation, to decrease the risk of modern slavery occurring in the first place.

We recommend worker-driven initiatives such as CAF that engage directly with vulnerable workers to combat modern slavery and promote decent work should be held up as best practice.

The photo below depicts CAF Representatives⁷ at a training session held in Sydney in October 2019:



Cleaners at the first CAF Representative training day – October 2019

⇒ **The promotion of decent work as an anti-slavery mechanism**

Modern slavery can flourish where workers are denied the basic conditions that form decent work; in other words, work that is paid fairly, that is safe, secure, and freely chosen, and undertaken with dignity.

Taking action to prevent the proliferation of dangerous or substandard employment practices in Australia by working across government, business and civil society to uphold decent work principles will have the greatest impact on reducing the incidence of modern slavery.

⁷ CAF Representatives are cleaners that have been nominated by their peers in CAF-certified buildings to educate other cleaners about their labour rights and assist them to raise issues in their workplace and up the supply chain.

- 3. The Government is committed to ensuring victims of modern slavery are supported, protected and empowered. Are there ways in which the Government can better reflect the voices of victims and their lived experiences in the 2020-24 Plan and Australia's response to modern slavery?**

We agree that this should be a central focus of the Government. There are many NGOs, unions and other organisations doing remarkable work to support, protect and empower victims of modern slavery in Australia at present and their contribution should be recognised and supported.

- 4. The Government is committed to ensuring that we can measure the impacts of the 2020-24 Plan. Are there evaluation methods, data sources or metrics the Government should consider in developing an evaluation framework?**

Despite only being operational for less than one year following our two-year pilot phase, CAF has already collected a rich corpus of data on labour rights abuses and remedies enacted through our certification scheme. We would welcome the opportunity to discuss some of our findings with the Government to assist in the development of an evaluation framework.

Appendix: CAF underpayment case study

1. The issue: Underpayment of vulnerable workers in the cleaning industry

The cleaning industry has some of the highest rates of worker underpayment in Australia. Investigations by the Fair Work Ombudsman, the United Workers Union, and academic researchers have found extensive non-compliance rates with minimum legal wages and entitlements for the past twenty years.⁸

CAF has identified and remediated numerous instances of underpayment through the CAF building certification scheme. Across three buildings alone and in less than 12 months⁹, CAF has recovered close to **\$36,000** of unpaid wages and superannuation for cleaners, with the average underpayment per cleaner affected amounting to just under **\$3,800**.

The broader impact CAF is having on underpayment in the cleaning industry is not, however, confined to these sums: CAF's proactive approach to assist cleaning contractors to implement good practice HR systems, working with stakeholders to put in place supply chain oversight mechanisms, and giving cleaners themselves a voice at work and in the supply chain, is contributing to building a culture of compliance in CAF-certified buildings whereby underpayment risk is mitigated and where it does occur, it can be resolved in a timely manner.

Types of underpayments uncovered thus far through CAF include:

- Underpayment of minimum hourly award or agreement rate;
- Cash back scams;
- Illegal wage deductions;
- Underpayment of superannuation guarantee;
- Non-payment of shift loading;
- Non-payment of penalty rates for weekend and public holiday work;
- Unpaid induction or training activities;
- Unpaid overtime;
- Overtime paid at base rate; and
- Non-payment of allowances.

Another key area of underpayment in the cleaning industry is sham contracting. While CAF's audit, worker engagement, and ongoing compliance processes include mechanisms to check for the

⁸ Fair Work Ombudsman (2016) 'Cleaning industry compliance needs to improve', Media Release, 13 May 2016, accessible at <https://www.fairwork.gov.au/about-us/news-and-media-releases/2016-media-releases/may-2016/20160513-cleaning-compliance-campaign-presser>

Fair Work Ombudsman (2018) *An inquiry into the procurement of cleaners in Tasmanian supermarkets*, accessible at <https://www.fairwork.gov.au/reports/inquiry-into-the-procurement-of-cleaners-in-tasmanian-supermarkets>

Black Economy Taskforce – Final Report, October 2017, accessible at: <https://treasury.gov.au/review/black-economy-taskforce/final-report>

Hunter, L. (2017) 'United Voice reveals wage theft in Victorian schools', *InClean*, 16 May 2017, accessible at <https://www.incleanmag.com.au/united-voice-reveals-wage-theft-victorian-schools/>

Fair Work Ombudsman (2019) 'FWO recovers entitlements for school cleaners', Media Release, 29 November 2019, accessible at <https://www.fairwork.gov.au/about-us/news-and-media-releases/2019-media-releases/november-2019/20191129-victorian-government-school-cleaners-report>

⁹ As at December 2019

presence of cleaning employees being misclassified as independent contractors, we have not yet come across sham contracting in CAF buildings, which is why it does not feature in the list above.

Examples of the underpayments remedied through CAF are featured below in [section 3](#).

2. How CAF addresses underpayment

CAF addresses worker underpayment in the cleaning industry through a rigorous identification, investigation and remediation process that involves all relevant stakeholders in the supply chain. CAF's approach promotes behavioural change, transparent and cooperative engagement throughout the supply chain, and worker education and engagement to drive a culture of compliance that cannot be achieved through point in time audits alone. CAF proceeds in the following manner:

- ⇒ Audit of a sample of payroll and attendance records to check whether cleaners are receiving their correct wages and entitlements.
- ⇒ Worker engagement to verify correct pay and entitlements and correct classification of employees that cannot be uncovered through a desk-based audit (e.g. targeting sham contracting, unpaid unrecorded overtime, payment of sick leave).
- ⇒ Where underpayment is identified through the sample of payroll records or through worker engagement, CAF requires that a more detailed investigation occurs to determine the full scope of underpayments throughout the life of the cleaning contract.
- ⇒ Once the full scope of underpayment has been ascertained, CAF requires that back-payment to all affected past and present employees occurs, in addition to improvements to payroll processes as a mitigation strategy, prior to certification being awarded.
- ⇒ Education through worker engagement so that cleaners understand their rights are supported to raise any inaccuracies with their pay.
- ⇒ Quarterly check-ins between the building manager and the CAF Representative, where the cleaning workforce representative can raise any payroll issues.
- ⇒ Ongoing compliance checks (monthly or quarterly) between the building manager and the cleaning contractor to promote transparent and accountable labour management.
- ⇒ Annual payroll compliance audits at CAF certified buildings at annual health checks to ensure ongoing compliance.

3. Examples of underpayment recovery through CAF

- **\$28,600 underpaid to 12 current and former employees at a CBD commercial building**
As part of an annual health check conducted in 2019, CAF uncovered over **\$26,116.22** worth of wage underpayments at a commercial building dating back to the start of 2017. The underpayments related to breaches of minimum engagement provisions within the enterprise agreement. With superannuation included, the total underpayment to workers at this building amounted to \$28,597.26. The average underpayment (wages and super) per affected employee was \$2,383.10.

As a result of this discovery, the employer has contacted all affected current and former employees to arrange back-payment of wages, superannuation and PAYG remittance. Some affected employees have since returned to their country of origin, and if they are not able to be contacted by the employer, their wages will be held in trust by the Fair Work Ombudsman, who will seek to locate these employees and reunite them with their wages.

In light of this underpayment, the cleaning contractor has put in place mechanisms to prevent further breaches of minimum engagement provisions.

	Breach of minimum engagement provisions
Wages	\$26,116.22
Super	\$2,481.04
PAYG tax	Unknown as yet
Total recovered	\$28,597.26 + applicable PAYG tax
Average wage and super recovered per cleaner affected	\$2,383.10

- **Shopping centre cleaners paid below-Award rate and not paid for inductions**

As part of the CAF certification audit at a shopping centre, CAF uncovered underpayment of weekend and public holiday rates stemming from the employer’s payroll system being incorrectly set up to use the previous year’s award rates. CAF also found that cleaners had not been paid to attend their induction.

CAF recovered **\$587.75** in wages and super for five employees who had been underpaid over a three-month period from the start date of the cleaning contract. CAF also required that the employer’s payroll system be updated and independently verified prior to CAF certification being awarded at the building.

In going through a CAF audit for this one site early in the life of the cleaning contract, the owner of this building, with CAF’s assistance, was able to identify and obtain remedy for the underpayments occurring both at this site and at the other buildings within their portfolio that are cleaned by this company. In addition to ensuring fair wages for their cleaners, this property owner significantly reduced the reputational and legal risk associated with underpayment of cleaners in their supply chain.

CAF certification provides cleaners a pathway to report and obtain remedy for any further underpayment that may arise at this building. CAF certification of this building goes further to affect thousands of other employees of this cleaning company who will now be paid at the correct rate following CAF’s intervention – cleaners whose underpayment would have gone un-noticed and unremedied.

CAF certification of this building also helped bring a cleaning company into compliance with minimum legal wages and entitlements, which is part of the educational and transformational mandate of CAF to drive industry-wide improvement.

The owner of this building now has oversight of their contractor’s compliance, assurance that their cleaners are being paid properly, and has maintained a cooperative relationship with their supplier that is based on transparency and accountability.

	Previous year’s Award rate applied to five employees	Unpaid induction of four employees	Grand total
Wages	\$363.95	\$172.80	\$536.75
Super	\$34.57	\$16.43	\$51.00
PAYG tax	n/a	n/a	n/a
Total recovered	\$398.52	\$189.23	\$587.75
Average wage and super recovered per cleaner affected	\$79.70	\$47.31	

- **Penalty rate and shift loading underpayments at a shopping centre**

At a shopping centre, CAF discovered underpayments affecting five out of seven cleaners as part of the audit during the application for certification. The underpayment centred on public holiday shifts worked being paid at the ordinary rate; and early morning shifts being paid at the lower day shift rate. A total of \$6,667.67 in wages and super was recovered for five employees and \$1,508 of PAYG tax was remitted to the ATO as a result of the CAF audit. The average wage and super underpayment per affected worker amounted to \$1,333.53.

	Public holiday underpayment for four cleaners for one public holiday	Early morning shift loading underpayment for three cleaners over a six-month period	Overall recovery of wages at this building (including compensation)
Wages	\$1,087.06	\$2508.84 backpay + \$2498.19 compensation. Total recovered: \$5,007.03	\$6,094.09
Super	\$97.91	\$475.67	\$573.58
PAYG tax	\$294.00	\$1508.00	\$1,802.00
Total recovered	\$1478.97	\$6990.70	\$8,469.67
Average wage and super recovered per cleaner affected	\$296.24	\$1,827.57	\$1,333.53

4. Next steps

- CAF is working with auditors to develop a tool to undertake bulk analysis of time and wage data. This will also facilitate the development of portfolio-wide building certification for large property owners who are committed to ensuring that all cleaners in their supply chain get paid properly.
- Building cultures of compliance in CAF-certified buildings through:
 - education and engagement with cleaners through their CAF Representatives,
 - building capabilities of building managers to monitor ongoing compliance through training programs and compliance tools,
 - working with cleaning contractors to improve their HR systems, policies and procedures to minimise the risk of cleaners being underpaid,
 - Rewarding transparency and accountability through the certification scheme,
- Refining the CAF pricing schedule by collecting and analysing data on the relationship between different allocations for on-costs relating to sick leave, training, uniforms, equipment etc., and the incidence of underpayment.



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