

# Brand Performance Check Van Heurck nv

This report covers the evaluation period 01-02-2020 to 31-01-2021

#### **About the Brand Performance Check**

Fair Wear Foundation (Fair Wear) believes that improving conditions for apparel product location workers requires change at many levels. Traditional efforts to improve conditions focus primarily on the product location. Fair Wear, however, believes that the management decisions of clothing brands have an enormous influence for good or ill on product location conditions.

Fair Wear's Brand Performance Check is a tool to evaluate and report on the activities of Fair Wear's member companies. The Checks examine how member company management systems support Fair Wear's Code of Labour Practices. They evaluate the parts of member company supply chains where clothing is assembled. This is the most labour intensive part of garment supply chains, and where brands can have the most influence over working conditions.

In most apparel supply chains, clothing brands do not own product locations, and most product locations work for many different brands. This means that in most cases Fair Wear member companies have influence, but not direct control, over working conditions. As a result, the Brand Performance Checks focus primarily on verifying the efforts of member companies. Outcomes at the product location level are assessed via audits and complaint reports, however the complexity of the supply chains means that even the best efforts of Fair Wear member companies cannot guarantee results.

Even if outcomes at the product location level cannot be guaranteed, the importance of good management practices by member companies cannot be understated. Even one concerned customer at a product location can have significant positive impacts on a range of issues like health and safety conditions or freedom of association. And if one customer at a product location can demonstrate that improvements are possible, other customers no longer have an excuse not to act. The development and sharing of these types of best practices has long been a core part of Fair Wear's work.

The Brand Performance Check system is designed to accommodate the range of structures and strengths that different companies have, and reflects the different ways that brands can support better working conditions.

This report is based on interviews with member company employees who play important roles in the management of supply chains, and a variety of documentation sources, financial records, supplier data. The findings from the Brand Performance Check are summarized and published at <a href="https://www.fairwear.org">www.fairwear.org</a>. The online <a href="https://www.fairwear.org">Brand Performance Check Guide</a> provides more information about the indicators.

#### On COVID-19

This years' report covers the response of our members and the impact on their supply chain due to the Covid-19 pandemic which started in 2020. The outbreak of the Covid-19 pandemic limited the brands' ability to visit and audit factories. To ensure the monitoring of working conditions throughout the pandemic, Fair Wear and its member brands made use of additional monitoring tools, such as complaints reports, surveys, and the consultation of local stakeholders. These sources may not provide as detailed insights as audit reports. To assess outcomes at production location level, we have included all available types of evidence to provide an accurate overview of the brands' management systems and their efforts to improve working conditions. Nevertheless, brands should resume verifying working conditions through audits when the situation allows for.

#### **Brand Performance Check Overview**

#### Van Heurck nv

**Evaluation Period: 01-02-2020 to 31-01-2021** 

Member company information	
Headquarters:	Deurne , Belgium
Member since:	2019-06-01
Product types:	Workwear
Production in countries where Fair Wear is active:	Tunisia
Production in other countries:	NA
Basic requirements	
Workplan and projected production location data for upcoming year have been submitted?	Yes
Actual production location data for evaluation period was submitted?	Yes
Membership fee has been paid?	Yes
Scoring overview	
% of own production under monitoring	73%
Benchmarking score	66
Category	Good

#### **Summary:**

Van Heurck nv (hereafter referred to as Van Heurck) has met most of Fair Wear's performance requirements. With a score of 66, the member is placed in the 'Good' category. Although the monitoring threshold does not determine the category this year, Van Heurck has fulfilled the monitoring requirements at suppliers responsible for 73% of its production volume.

#### **Corona Addendum:**

Despite the COVID-19 crisis, Van Heurck was able to continue its operations throughout 2020 without disruptions, as it was possible for brand staff to work from home and customers were spread across sectors, including healthcare.

The production locations in Tunisia suffered some production disruptions due to lockdowns and local government protocols restricting factory operations and worker movement. Key risks identified by the brand and supplier include- health risks due spread of COVID-19, and wage loss linked to factory lockdowns.

In Tunisia, the legal minimum wage is fixed by hour and not by month. This meant that workers suffered wage losses during lockdowns. The supplier took efforts to ensure that all workers received the government-stipulated benefit of 200DT. The brand facilitated advance payments of clothing and holiday bonus. Despite these efforts, not all workers received wages above legal minimum wages (for the month) during the lockdown period.

The brand provided COVID-19 self-test kits to the factories to reduce the risk of infection spread. That apart, the factory established additional Health & Satefy measures such as, separating workstations with plexiglass screens, frequent sanitisation, improving ventilation, facilitating worker committee meetings with doctors to promote understanding of health risks, and keeping workers informed.

#### **Performance Category Overview**

**Leader**: This category is for member companies who are doing exceptionally well, and are operating at an advanced level. Leaders show best practices in complex areas such as living wages and freedom of association.

**Good**: It is Fair Wear's belief that member companies who are making a serious effort to implement the Code of Labour Practices—the vast majority of Fair Wear member companies—are 'doing good' and deserve to be recognized as such. They are also doing more than the average clothing company, and have allowed their internal processes to be examined and publicly reported on by an independent NGO. The majority of member companies will receive a 'Good' rating.

**Needs Improvement**: Member companies are most likely to find themselves in this category when major unexpected problems have arisen, or if they are unable or unwilling to seriously work towards CoLP implementation. Member companies may be in this category for one year only after which they should either move up to Good, or will be moved to suspended.

**Suspended**: Member companies who either fail to meet one of the Basic Requirements, have had major internal changes which means membership must be put on hold for a maximum of one year, or have been in Needs Improvement for more than one year. Member companies may remain in this category for one year maximum, after which termination proceedings will come into force.

Categories are calculated based on a combination of benchmarking score and the percentage of own production under monitoring. The specific requirements for each category are outlined in the Brand Performance Check Guide.

## **1. Purchasing Practices**

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1a Percentage of production volume from production locations where member company buys at least 10% of production capacity.	100%	Member companies with less than 10% of a production location's production capacity generally have limited influence on production location managers to make changes.	Supplier information provided by member company.	4	4	0

**Comment:** Van Heurck sources 100% of its production from three production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.1b Percentage of production volume from production locations where member company buys less than 2% of its total FOB.	0%	Fair Wear provides incentives to clothing brands to consolidate their supplier base, especially at the tail end, as much as possible, and rewards those members who have a small tail end. Shortening the tail end reduces social compliance risks and enhances the impact of efficient use of capital and remediation efforts.	Production location information as provided to Fair Wear.	4	4	0

**Comment:** At no production location does Van Heurck source less than 2% of its total FOB.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.2 Percentage of production volume from production locations where a business relationship has existed for at least five years.	100%	Stable business relationships support most aspects of the Code of Labour Practices, and give production locations a reason to invest in improving working conditions.	Supplier information provided by member company.	4	4	0

**Comment:** Van Heurck's sourcing strategy set in the mid-1980's, focused on Tunisia, with the brand sourcing from its first (partially owned) supplier in 1985. At all production locations, including subcontractors, the brand has over five years of business relationship.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.3 All (new) production locations are required to sign and return the questionnaire with the Code of Labour Practices before first bulk orders are placed.	Yes	The CoLP is the foundation of all work between production locations and brands, and the first step in developing a commitment to improvements.	Signed CoLPs are on file.	2	2	0

**Comment:** All production locations have signed and returned the questionnaire with the Code of Labour Practices.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.4 Member company conducts human rights due diligence at all (new) production locations before placing orders.	Intermediate	Due diligence helps to identify, prevent and mitigate potential human rights problems at suppliers.	Documentation may include pre-audits, existing audits, other types of risk assessments.	2	4	0

**Comment:** Van Heurck's sourcing strategy was set in the mid-1980's and the brand continues to source from one country, Tunisia, and from three production locations (managed by the same supplier) where it has 80% ownership. Over the years, the brand has made no changes to its factory relations. The capacity currently needed by Van Heurck is sufficiently covered by the three production locations with the possibility to support future growth.

The brand has been working with the factory manager for over 25 years. The factory management team is Tunisian with a solid understanding of local regulations, risks and keeps the brand updated about developments in the country. The brand generally visits the factory every month, but due to COVID-19, this has been replaced by online meetings. Due to its long years of sourcing from Tunisia, owned production locations, and strong local presence, the brand has not done a formal risk assessment.

With regard to COVID-19, the brand was in contact with the factory almost on a daily basis. The factory management kept the brand informed about the COVID-19 situation, lockdowns, and disruption in the production schedules. Key risks identified by the brand and supplier include- health risks due spread of COVID-19, and wage loss linked to factory lockdowns. The supplier took proactive measures to raise awareness of workers on COVID-19 through awareness sessions and information posters. The brand provided COVID-19 self-test kits to the factories to reduce the risk of infection spread.

**Recommendation:** A country risk assessment is a critical step to mitigate risk and prevent potential issues. Fair Wear recommends that Van Heurck develop a risk assessment for Tunisia, to further support the brand in taking proactive measures in working with its supplier to address those risks. Fair Wear advises the brand to use information from Fair Wear country studies, wage ladders, CSR Risk Check (https://www.mvorisicochecker.nl/en/risk-check) to develop a risk assessment for Tunisia. For gender risk assessments, Van Heurck can use the gender toolkit that has fact sheets per country, supplier checklists, and a model policy on Sexual Harassment.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.5 Production location compliance with Code of Labour Practices is evaluated in a systematic manner.	Yes, and leads to production decisions	A systemic approach is required to integrate social compliance into normal business processes, and supports good decisionmaking.	Documentation of systemic approach: rating systems, checklists, databases, etc.	2	2	0

**Comment:** Van Heurck has a short supply chain, three factories in Tunisia (managed by the same supplier) where it has 80% ownership and consequently has not set up a formal process to evaluate factory compliance with Code of Labour Practices. Nevertheless, the managing director of the brand, the factory manager, and the quality manager are involved in reviewing outcomes of the audits, production planning, and issues at the factory. All findings are discussed and addressed.

**Recommendation:** Van Heurck is encouraged to establish a formal supplier evaluation system in which quality, relationship, price, and planning are assessed and allows the brand to engage in systematic review discussion with the factory.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.6 The member company's production planning systems support reasonable working hours.	Strong, integrated systems in place.	Member company production planning systems can have a significant impact on the levels of excessive overtime at production locations.	Documentation of robust planning systems.	4	4	0

**Comment:** The production planning is managed jointly by the brand and the supplier. This is done with the support of a sophisticated ERP system that offers insights on fabric, component availability/ shipping time, factory capacity (lines that are available / not reserved), labour minutes per style and lead time. This information is automatically updated and ensures that the factory does not overestimate its capacity to take additional orders that may contribute to excessive overtime.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.7 Degree to which member company mitigates root causes of excessive overtime.	No production problems /delays have been documented.	Some production delays are outside of the control of member companies; however there are a number of steps that can be taken to address production delays without resorting to excessive overtime.	Evidence of how member responds to excessive overtime and strategies that help reduce the risk of excessive overtime, such as: root cause analysis, reports, correspondence with factories, etc.	N/A	6	0

**Comment:** Fair Wear audits conducted at two factories of the brand did not indicate issues pertaining to excessive overtime.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.8 Member company can demonstrate the link between its buying prices and wage levels in production locations.	Advanced	Understanding the labour component of buying prices is an essential first step for member companies towards ensuring the payment of minimum wages – and towards the implementation of living wages.	Interviews with production staff, documents related to member's pricing policy and system, buying contracts.	4	4	0

**Comment:** The brand and the supplier work on open costing and price setting on the shared ERP system. The supplier has a separate system that calculates the Labour Minutes for each style. The supplier enters the labour minutes (this field is not editable by the brand) to the ERP system, along with the cost per minute. For large orders, taking into account improved efficiency, the cost per minute is sometimes negotiated by the brand. As the factories are owned by the brand it is aware of wage levels, and the impact of its prices on wages at production locations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.9 Member company actively responds if production locations fail to pay legal minimum wages and/or fail to provide wage data to verify minimum wage is paid.	No	If a supplier fails to pay minimum wage or minimum wage payments cannot be verified, Fair Wear member companies are expected to hold management of the supplier accountable for respecting local labour law. Payment below minimum wage must be remediated urgently.	Complaint reports, CAPs, additional emails, Fair Wear Audit Reports or additional monitoring visits by a Fair Wear auditor, or other documents that show minimum wage issue is reported/resolved.	-2	O	-2

Comment: Fair Wear audits conducted at two factories of the brand did not indicate issues on payment of Legal Minimum Wages. But workers suffered wage losses due to lockdown in April, with local regulations only allowing a gradual increase in worker numbers in the factory. The supplier took efforts to ensure all workers receive the government-stipulated benefit of 200DT. The brand facilitated advance payments of clothing and holiday bonus. Workers who were affected by COVID-19 and had to take sick leaves received payment for half of the leaves, above the compensation provided by social security services. That apart, workers who indicated a need for emergency funds were supported with interest-free loans. Despite these efforts, not all workers received wages above legal minimum wages during the lockdown period.

**Requirement:** During COVID-19 the member is expected to thoroughly check with its suppliers whether they foresee any issues with payment of wages. The brand is encouraged to review the Fair Wear / ETI COVID Lost Wages and Jobs Series, which lays out guidance for member brands to uphold their responsibilities to workers in their supply chains who are facing reduced wages in the context of COVID-19.

Please note that following Fair Wear's policy for repeated non-compliance in Fair Wear's Brand Performance Checks, members that receive an insufficient or -2 score on this indicator for the second year in a row, will be placed in the 'Needs Improvement' category.

**Recommendation:** In case of a crisis such as COVID-19, the brand is encouraged to find solutions in collaboration with their suppliers to ensure they can continue the payment of minimum wages to their workers.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.10 Evidence of late payments to suppliers by member company.	No	Late payments to suppliers can have a negative impact on production locations and their ability to pay workers on time. Most garment workers have minimal savings, and even a brief delay in payments can cause serious problems.	Based on a complaint or audit report; review of production location and member company financial documents.	0	0	-1

**Comment:** The brand is aware of the supplier's cash flow situation and generally, all invoices are paid on time.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.11 Degree to which member company assesses and responds to root causes for wages that are lower than living wages in production locations.	Intermediate	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach	Evidence of how payment below living wage was addressed, such as: Internal policy and strategy documents, reports, correspondence with factories, etc	4	6	0

**Comment:** The brand is aware of wage levels at supplier locations. To support workers receive better wages and cope with inflation the brand and supplier have instituted different bonuses, e.g. transport bonus, year-end bonus, among others.

**Requirement:** Van Heurck owns the supplier, and hence is held more accountable for implementing adequate steps. The member is expected to take an active role in discussing living wages with the factory management and should take steps to work towards living wages.

**Recommendation:** As the supplier is owned by the brand, Fair Wear encourages the brand to include other Fair Wear members (also sourcing at the factory) in its work towards living wages.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.12 Percentage of production volume from factories owned by the member company (bonus indicator).	80%	Owning a supplier increases the accountability and reduces the risk of unexpected CoLP violations. Given these advantages, this is a bonus indicator. Extra points are possible, but the indicator will not negatively affect an member company's score.	Supplier information provided by member company.	2	2	0

**Comment:** The brand has 80% ownership of its supplier.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.13 Member company determines and finances wage increases.	None	Assessing the root causes for wages lower than living wages will determine what strategies/interventions are needed for increasing wages, which will result in a systemic approach.	Evidence of how payment below living wage was addressed, such as: internal policy and strategy documents, reports, correspondence with factories, etc.	0	6	0

**Comment:** The brand does not contribute to higher wages through paying its share of a target wage nor does any of its locations pay a living wage.

**Recommendation:** In determining what is needed and how wages should be increased, it is recommended to involve worker representation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
1.14 Percentage of production volume where the member company pays its share of the target wage.	0%	Fair Wear member companies are challenged to adopt approaches that absorb the extra costs of increasing wages.	Member company's own documentation, evidence of target wage implementation, such as wage reports, factory documentation, communication with factories, etc.	0	6	O

**Comment:** The brand is yet to set target wages for production locations.

# **Purchasing Practices**

**Possible Points: 46** 

## 2. Monitoring and Remediation

Basic measurements	Result	Comments
% of production volume where an audit took place.	73%	
% of production volume where monitoring requirements for low-risk countries are fulfilled.	0%	To be counted towards the monitoring threshold, FWF low-risk policy should be implemented. See indicator 2.9. (N/A = no production in low risk countries.)
Member meets monitoring requirements for tail-end production locations.	N/A	
Requirement(s) for next performance check		
Total monitoring threshold:	73%	Measured as percentage of production volume (Minimums: 1 year: 40%; 2 years 60%; 3 years+: 80-100%)

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.1 Specific staff person is designated to follow up on problems identified by monitoring system.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	2	2	-2

**Comment:** The certification and member coordinator at the brand and quality manager at the supplier is designated to follow up on problems identified by the monitoring system. They are overseen by the managing director of the brand and the factory manager.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.2 Quality of own auditing system meets FWF standards.	Member makes use of FWF audits and/or external audits only	In case Fair Wear teams cannot be used, the member companies' own auditing system must ensure sufficient quality in order for Fair Wear to approve the auditing system.	Information on audit methodology.	N/A	0	-1

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.3 Audit Report and Corrective Action Plan (CAP) findings are shared with factory and worker representation where applicable. Improvement timelines are established in a timely manner.	Yes	2 part indicator: Fair Wear audit reports were shared and discussed with suppliers within two months of audit receipt AND a reasonable time frame was specified for resolving findings.	Corrective Action Plans, emails; findings of followup audits; brand representative present during audit exit meeting, etc.	2	2	-1

**Comment:** CAPs are shared with factories and improvement timelines are established in a timely manner.

**Recommendation:** Before an audit takes place, Van Heurck is recommended to check with the supplier whether worker representatives are active. In this way, they can be involved from the start of an audit and be invited for the audit opening and exit meeting. Including workers when following up on audit reports gives them the opportunity to be informed of issues in the factory and have a voice in the prioritization of issues.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems.	Intermediate	Fair Wear considers efforts to resolve CAPs to be one of the most important things that member companies can do towards improving working conditions.	CAP-related documentation including status of findings, documentation of remediation and follow up actions taken by member. Reports of quality assessments. Evidence of understanding relevant issues.	6	8	-2

Comment: The brand has a short supply chain (one supplier company with 3 own production locations in the same country) with 80% ownership, hence has not set up a formal system for monitoring and remediation. The brand is in almost daily contact with the supplier, which allows for active follow-up on problems reported by the monitoring system. Two Fair Wear audits were conducted at the brand's production locations in 2020. Van Heurck was able to demonstrate follow-up and progress on the CAPs.

**Recommendation:** The member's monitoring approach should facilitate a systematic review of findings to address root causes of issues. COVID-19 related issues can be included in outstanding CAPs to facilitate monitoring. Fair Wear encourages the brand to discuss, identify and address root causes for issues reported in the audit to ensure sustainable remediation.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year.	not applicable	Due to the Covid-19 pandemic, brands could often not visit their suppliers from March - December 2020. For consistency purposes, we therefore decided to score all our member brands N/A on visiting suppliers over the year 2020.	Member companies should document all production location visits with at least the date and name of the visitor.	N/A	4	O

**Comment:** This indicator is not applicable for all members due to the travel restrictions in 2020.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.6 Existing audit reports from other sources are collected.	No existing reports/all audits by FWF or FWF member company	Existing reports form a basis for understanding the issues and strengths of a supplier, and reduces duplicative work.	Audit reports are on file; evidence of followup on prior CAPs. Reports of quality assessments.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.7 Compliance with FWF risk policies.	Average score depending on the number of applicable policies and results	Aside from regular monitoring and remediation requirements under Fair Wear membership, countries, specific areas within countries or specific product groups may pose specific risks that require additional steps to address and remediate those risks. Fair Wear requires member companies to be aware of those risks and implement policy requirements as prescribed by Fair Wear.	Policy documents, inspection reports, evidence of cooperation with other customers sourcing at the same factories, reports of meetings with suppliers, reports of additional activities and/or attendance lists as mentioned in policy documents.	3	6	-2
Compliance with FWF enhanced monitoring programme Bangladesh	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF Myanmar policy	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on abrasive blasting	Policies are not relevant to the company's supply chain			N/A	6	-2
Compliance with FWF guidance on risks related to Turkish garment factories employing Syrian refugees	Policies are not relevant to the company's supply chain			N/A	6	-2
Other risks specific to the member's supply chain are addressed by its monitoring system	Intermediate			3	6	-2

**Comment:** From the mid-1980s the brand continues to source from one country, Tunisia, and from three factories (managed by the same supplier company) where it has 80% ownership. Due to its long years of sourcing from Tunisia, owned production locations, and strong local presence, the brand has not done a formal risk assessment.

#### COVID-19

The brand was in contact with the factory almost on a daily basis. The factory management kept the brand informed about the COVID-19 situation in Tunisia, lockdowns, and disruption in the production schedules. Key risks identified by the brand and supplier include- health risks due spread of COVID-19, and wage loss linked to factory lockdowns. The supplier took proactive measures to raise awareness of workers on COVID-19 through awareness sessions and information posters. The brand provided COVID-19 self-test kits to the factories to reduce the risk of infection spread. That apart, the factory established additional Health & Safety measures such as separating workstations with plexiglass screens, frequent sanitisation, improving ventilation, facilitating worker committee meetings with doctors to promote understanding of health risks, and keeping workers informed. Additionally, the factory adjusted production schedules and organised production lines to follow COVID-19 protocols.

**Recommendation:** The member should take measures to prevent the loss of jobs or lowering of wages at suppliers due to COVID-19, following the guidelines in Handbook: Covid-19 Lost wages and jobs series.

The brand is encouraged to monitor and analyse Human Rights risks pertaining to Tunisia. Van Heurck can use the information provided in Fair Wear (country studies, stakeholder information) as well as publications of other non-governmental organisations.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.8 Member company cooperates with other FWF member companies in resolving corrective actions at shared suppliers.	Active cooperation	Cooperation between customers increases leverage and chances of successful outcomes. Cooperation also reduces the chances of a factory having to conduct multiple Corrective Action Plans about the same issue with multiple customers.	Shared CAPs, evidence of cooperation with other customers.	2	2	-1

**Comment:** One production location of the brand is shared with another Fair Wear member. But as the brand owns the location cooperation mostly pertains to sharing audit costs and updating on CAP status.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.9 Percentage of production volume where monitoring requirements for low-risk countries are fulfilled.	No production in low-risk countries	Low-risk countries are determined by the presence and proper functioning of institutions which can guarantee compliance with national and international standards and laws. Fair Wear has defined minimum monitoring requirements for production locations in low-risk countries.	Documentation of visits, notification of suppliers of Fair Wear membership; posting of worker information sheets, completed questionnaires.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.10 Extra bonus indicator: in case FWF member company conducts full audits at tail-end production locations (when the minimum required monitoring threshold is met).	No	Fair Wear encourages its members to monitor 100% of its production locations and rewards those members who conduct full audits above the minimum required monitoring threshold.	Production location information as provided to Fair Wear and recent Audit Reports.	N/A	2	0

 $\textbf{Comment:} \ \textbf{The brand does not have any tail-end production locations}.$ 

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.11 Questionnaire is sent and information is collected from external brands resold by the member company.	No external brands resold	Fair Wear believes it is important for affiliates that have a retail/wholesale arm to at least know if the brands they resell are members of Fair Wear or a similar organisation, and in which countries those brands produce goods.	Questionnaires are on file.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.12 External brands resold by member companies that are members of another credible initiative (% of external sales volume).	No external brands resold	Fair Wear believes members who resell products should be rewarded for choosing to sell external brands who also take their supply chain responsibilities seriously and are open about in which countries they produce goods.	External production data in Fair Wear's information management system. Documentation of sales volumes of products made by Fair Wear or FLA members.	N/A	3	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
2.13 Questionnaire is sent and information is collected from licensees.	No licensees	Fair Wear believes it is important for member companies to know if the licensee is committed to the implementation of the same labour standards and has a monitoring system in place.	Questionnaires are on file. Contracts with licensees.	N/A	1	0

# **Monitoring and Remediation**

**Possible Points: 21** 

#### 3. Complaints Handling

Basic measurements	Result	Comments
Number of worker complaints received since last check.	0	At this point, FWF considers a high number of complaints as a positive indicator, as it shows that workers are aware of and making use of the complaints system.
Number of worker complaints in process of being resolved.	0	
Number of worker complaints resolved since last check.	0	

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.1 A specific employee has been designated to address worker complaints.	Yes	Followup is a serious part of Fair Wear membership, and cannot be successfully managed on an ad-hoc basis.	Manuals, emails, etc., demonstrating who the designated staff person is.	1	1	-1

**Comment:** The certification and member coordinator at the brand and quality manager at the supplier is designated to follow up on problems reported on the complaints hotline. They are overseen by the managing director of the brand and the factory manager. At the same time, the supplier has an internal 'Commission Consultative' which discusses topics such as working hours, salaries, bonuses, Healthcare, measures to limit the spread of COVID-19 etc.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.2 Member company has informed factory management and workers about the FWF CoLP and complaints hotline.	Yes	Informing both management and workers about the Fair Wear Code of Labour Practices and complaints hotline is a first step in alerting workers to their rights. The Worker Information Sheet is a tool to do this and should be visibly posted at all production locations.	Photos by company staff, audit reports, checklists from production location visits, etc.	2	2	-2

**Comment:** The brand took steps to ensure that Fair Wear CoLP is displayed at all three production locations and workers are informed about the complaints procedure.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.3 Degree to which member company has actively raised awareness of the FWF CoLP and complaints hotline.	0%	After informing workers and management of the Fair Wear CoLP and the complaints hotline, additional awareness raising and training is needed to ensure sustainable improvements and structural workermanagement dialogue.	Training reports, Fair Wear's data on factories enrolled in the WEP basic module. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

**Comment:** Fair Wear audits indicate limited awareness of workers on the Fair Wear CoLP. The factory reviewed the cause for limited awareness and concluded that Fair Wear's new branding is sometimes confusing for workers. At the same time, no worker training has been conducted at production locations towards raising awareness on the Fair Wear CoLP and complaints hotline.

**Requirement:** Fair Wear requires members to actively raise awareness about the Fair Wear Code of Labour Practices and Fair Wear complaint hotline. Van Heurck should ensure good quality systematic training of workers and management on these topics. To this end, members can either use Fair Wear's Workplace Education Programme (WEP) basic module or implement training related to the Fair Wear CoLP and complaint hotline through service providers or brand staff. Fair Wear's guidance on training quality standards is available on the Member Hub.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.4 All complaints received from production location workers are addressed in accordance with the FWF Complaints Procedure.	No complaints received	Providing access to remedy when problems arise is a key element of responsible supply chain management. Member company involvement is often essential to resolving issues.	Documentation that member company has completed all required steps in the complaints handling process.	N/A	6	-2

**Comment:** No complaints were received from any production location on the Fair Wear complaints hotline.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
3.5 Cooperation with other customers in addressing worker complaints at shared suppliers.	No complaints or cooperation not possible / necessary	Because most production locations supply several customers with products, involvement of other customers by the Fair Wear member company can be critical in resolving a complaint at a supplier.	Documentation of joint efforts, e.g. emails, sharing of complaint data, etc.	N/A	2	0

**Comment:** No complaints were received from any of the production locations on the Fair Wear complaints hotline.

## **Complaints Handling**

**Possible Points: 9** 

## 4. Training and Capacity Building

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.1 All staff at member company are made aware of FWF membership.	Yes	Preventing and remediating problems often requires the involvement of many different departments; making all staff aware of Fair Wear membership requirements helps to support cross-departmental collaboration when needed.	Emails, trainings, presentation, newsletters, etc.	1	1	o

**Comment:** In the annual 'all-staff meeting' the brand discussed in detail the Fair Wear membership, CoLP, and related requirements. Fair Wear logo is part of the staff email signature as well.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.2 All staff in direct contact with suppliers are informed of FWF requirements.	Yes	Sourcing, purchasing and CSR staff at a minimum should possess the knowledge necessary to implement Fair Wear requirements and advocate for change within their organisations.	Fair Wear Seminars or equivalent trainings provided; presentations, curricula, etc.	2	2	-1

**Comment:** Being a small organization with its own production locations, information is freely shared between the brand and supplier staff, including on Fair Wear membership.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices.	Member does not use agents/contractors	Agents have the potential to either support or disrupt CoLP implementation. It is the responsibility of member company to ensure agents actively support the implementation of the CoLP.	Correspondence with agents, trainings for agents, Fair Wear audit findings.	N/A	2	0

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.4 Factory participation in training programmes that support transformative processes related to human rights.	0%	Complex human rights issues such as freedom of association or gender-based violence require more in-depth trainings that support factory-level transformative processes. Fair Wear has developed several modules, however, other (member-led) programmes may also count.	Training reports, Fair Wear's data on factories enrolled in training programmes. For alternative training activities: curriculum, training content, participation and outcomes.	0	6	0

**Comment:** The brand's production locations have not participated in training programmes that support transformative processes related to human rights.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
4.5 Degree to which member company follows up after a training programme.	No training programmes have been conducted or member produces solely in low-risk countries	After factory-level training programmes, complementary activities such as remediation and changes on brand level will achieve a lasting impact.	Documentation of discussions with factory management and worker representatives, minutes of regular worker-management dialogue meetings or anti-harassment committees.	N/A	2	O

## **Training and Capacity Building**

**Possible Points: 9** 

## **5. Information Management**

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.1 Level of effort to identify all production locations.	Advanced	Any improvements to supply chains require member companies to first know all of their production locations.	Supplier information provided by member company. Financial records of previous financial year. Documented efforts by member company to update supplier information from its monitoring activities.	6	6	-2

**Comment:** Van Heurck sources from three production locations owned by the brand. The supplier only outsources support processes to production locations that are selected and directly monitored by the supplier. These subcontractors have been informed of Fair Wear membership requirements.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
5.2 CSR and other relevant staff actively share information with each other about working conditions at production locations.	Yes	CSR, purchasing and other staff who interact with suppliers need to be able to share information in order to establish a coherent and effective strategy for improvements.	Internal information system; status CAPs, reports of meetings of purchasing/CSR; systematic way of storing information.	1	1	-1

**Comment:** Being a small organization with its own production locations, information is freely shared between certification and member coordinator at the brand, and quality manager at the supplier. They are overseen by the managing director of the brand and the factory manager.

# **Information Management**

**Possible Points: 7** 

## 6. Transparency

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.1 Degree of member company compliance with FWF Communications Policy.	Minimum communications requirements are met AND no significant problems found	Fair Wear's communications policy exists to ensure transparency for consumers and stakeholders, and to ensure that member communications about Fair Wear are accurate. Members will be held accountable for their own communications as well as the communications behaviour of 3rd-party retailers, resellers and customers.	Fair Wear membership is communicated on member's website; other communications in line with Fair Wear communications policy.	2	2	-3

**Comment:** Van Heurck communicates about Fair Wear through the company website, social report, logos on email signatures, catalogs, and follows communication guidelines. Being the first year of Fair Wear membership the brand currently does not engage in 'on-garment communication'.

**Recommendation:** The brand is encouraged to review Fair Wear's communications policy to begin 'on-garment communication'.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.2 Member company engages in advanced reporting activities.	Supplier list is disclosed to the public.	Good reporting by members helps to ensure the transparency of Fair Wear's work and shares best practices with the industry.	Member company publishes one or more of the following on their website: Brand Performance Check, Audit Reports, Supplier List.	2	2	O

**Comment:** Van Heurck has disclosed 100% of factories to other members in FairForce and on the Fair Wear website. The brand has also disclosed its suppliers and audit results in its social report.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
6.3 Social Report is submitted to FWF and is published on member company's website.	Complete and accurate report submitted to FWF AND published on member's website.	The social report is an important tool for members to transparently share their efforts with stakeholders. Member companies should not make any claims in their social report that do not correspond with Fair Wear's communication policy.	Social report that is in line with Fair Wear's communication policy.	2	2	-1

**Comment:** The brand has submitted the social report and published it on its website.

# **Transparency**

**Possible Points: 6** 

#### 7. Evaluation

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.1 Systemic annual evaluation of FWF membership is conducted with involvement of top management.	Yes	An annual evaluation involving top management ensures that Fair Wear policies are integrated into the structure of the company.	Meeting minutes, verbal reporting, Powerpoints, etc.	2	2	0

**Comment:** The Fair Wear membership is overseen by the managing director of the brand.

Performance indicators	Result	Relevance of Indicator	Documentation	Score	Max	Min
7.2 Level of action/progress made on required changes from previous Brand Performance Check implemented by member company.	No requirements were included in previous Check	In each Brand Performance Check report, Fair Wear may include requirements for changes to management practices. Progress on achieving these requirements is an important part of Fair Wear membership and its process approach.	Member company should show documentation related to the specific requirements made in the previous Brand Performance Check.	N/A	4	-2

**Comment:** This is the first Brand Performance Check for Van Heurck.

#### **Evaluation**

**Possible Points: 2** 

#### **Recommendations to Fair Wear**

- 1. Audit report and CAP format can be made user friendly
- 2. Social report format can be improved
- 3. Regular contact and reminder from the brand liaison will be good to have

## **Scoring Overview**

Category	Earned	Possible
Purchasing Practices	30	46
Monitoring and Remediation	15	21
Complaints Handling	3	9
Training and Capacity Building	3	9
Information Management	7	7
Transparency	6	6
Evaluation	2	2
Totals:	66	100

Benchmarking Score (earned points divided by possible points)

66

**Performance Benchmarking Category** 

Good

## **Brand Performance Check details**

Date of Brand Performance Check:
06-09-2021
Conducted by:
Supraja Suresh
Interviews with:
Serge Van Heurck- Managing Director

Abid Salem - Quality Manager, Apparel @work