

**28 May 2013**  
**Mark H Heaven**  
**CEO**  
**TRaC Global**

Dear Richard,

I have reviewed the discussion paper, the document is well structured as a top level discussion paper, setting clear objectives, deliverables and process. I have a number of observations, I appreciate that these observations are probably too micro for this macro document, but I hope they will serve to highlight some of the practicalities associated with an assurance programme.

1. What is the link to ISO 26000, whilst not a management system standard or a certification scheme, it does assist in the promotion and understanding of the HR assurance and reporting, it is not clear in the document how or if meeting the proposed HR assurance helps meet the guiding principles of such documents?
2. Our experience shows that a scheme such as the one proposed needs management buy in at the executive and senior levels with a documented process to flow down the commitment and empowerment to deliver the HR assurance. We would suggest that rather than the company produce it's statement for review by the HR assurance provider, that the HR assurance provider works to build a commitment with the company from the outset, initially meeting with all of the Executive and senior management team and via a documented Q&A session ensures buy in, if on analysis the HR assurance team is not convinced by management commitment then this is addressed before the program goes ahead. The management team with the HR assurance provider should draw up a commitment to continuous improvement in the key areas, implementing a commitment to improve based on best practice, before the company produces it's report for review.
3. Any assurance scheme, in our experience, is only successful if the company can influence and control it's own supply chain. In terms of Machinery Safety, and Provision and Use of Work Equipment Regulations (PUWER) it is often our experience that a company will adhere to, for instance EU or US law for its manufacturing, but will have little or no control over its supply chain manufacturing in, again for example, South East Asia.

How will the scheme assure the supply chains, how will the HR assurance provider confirm buy in and adherence by the supply chain to the companies stated objectives, what are the control mechanisms that

replace the inadequate “spot Auditing” in the supply chain, how will corruption be mitigated?

4. It is clear from the document, that this is an assurance scheme that strives for continuous improvement but it is not clear what the “rewards” for that are, e.g. Use of a logo, certification listing etc. Does, for instance, the company secretary use registration with the scheme to lever liability insurance premiums? What happens if the continuous improvement plan is not realised and HR violations are observed, how would this be reflected in the HR assurance documentation, can the participating company block negative review?
5. Appointment of the assurance provider and their background and training needs clarification, HR assurance auditing will be complex, and a participating company needs to understand what skill set the assurance provider.

I trust these observations are useful.

Best Regards

Mark

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