Labl Fashion

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CONTROLLED OPERATIONAL MANUAL

Ethical Work, People, Safeguarding and Grievance Manual

Protect lawful, fair, safe, inclusive and dignified work across Labl Fashion and controlled partner activities.

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Owner	Managing Director / designated manual owner
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Review	Annual and after material legal, operational, incident or strategy change
Classification	Controlled internal and approved partner-use document

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1. Purpose, scope and authority

Protect lawful, fair, safe, inclusive and dignified work across Labl Fashion and controlled partner activities.

SCOPE Applies to employees, trainees, interns, contractors, visitors, community interfaces and partners where Labl Fashion controls or contractually influences working conditions.

This manual supports the Labl Fashion Strategic Plan and Comprehensive Business Plan 2027–2030. It does not replace applicable Kenyan law, binding customer/partner requirements, professional advice or a more stringent approved control. Where requirements conflict, work must pause and the manual owner must obtain an authorised decision.

2. Governing principles

- No forced labour, child labour, harassment, discrimination, retaliation or unsafe work.
- Written terms, lawful pay, working time, leave and social protection are minimum controls.
- Worker voice and grievance are management information, not disloyalty.
- Photographs, stories and personal data require informed, revocable consent.
- Partners are risk-assessed and corrective action prioritises remedy to affected people.

3. Roles and accountability

Role	Core accountability
Board/MD	Set ethical-work expectations, resources, oversight and remedy accountability.
People lead	Maintain terms, payroll interface, working-time, welfare, competence and case records.
Supervisors	Allocate fair work, prevent harassment, monitor fatigue and respond promptly.
Safeguarding focal person	Receive concerns, protect affected persons and coordinate confidential response.
Workers/trainees	Follow safe conduct, respect others and use reporting channels.
Partner owner	Due-diligence labour conditions and manage contractual corrective action.

4. Standard operating procedure

The following sequence is the minimum controlled workflow. The owner may add risk-based checks, but may not omit a required approval, evidence or safeguard without an authorised exception.

4.1 Recruitment

Approved role, fair selection, identity/age/work eligibility, no worker-paid recruitment fees.

4.2 Engagement

Written terms, induction, pay, hours, conduct, safety, grievance and data/consent information.

4.3 Work planning

Competence-based assignment, reasonable targets, breaks, overtime controls and ergonomic review.

4.4 Pay and records

Authorised time/output where applicable, payroll review, timely payment and payslip.

4.5 Voice and consultation

Toolbox talks, worker meetings, safety participation and protected feedback.

4.6 Grievance intake

Multiple channels, acknowledgement, risk triage, confidentiality and non-retaliation.

4.7 Investigation/remedy

Impartial fact finding, protection, decision, remedy, appeal and systemic action.

4.8 Exit

Final dues, property/data return, records, interview and protected references.

5. Control matrix

Control point	Required control
Age and identity	Verified before work; young-worker restrictions where lawful and applicable.
Working time	Planned, recorded and reviewed; overtime voluntary/lawful and fatigue controlled.
Harassment/safeguarding	Immediate protection, specialist referral and conflict-free investigation.
Pay	Approved rates, deductions only lawful/authorised, reconciliation and prompt correction.
Consent	Specific purpose, understandable language, no coercion, withdrawal route.
Retaliation	Monitored after grievance; adverse action requires independent review.
Partner harm	Stop/contain serious harm, protect people and require time-bound remedy.

6. Exceptions, incidents and escalation

1. Stop or contain any condition that presents immediate danger, illegality, serious harm, uncontrolled loss, material product risk or unauthorised disclosure.
2. Notify the supervisor/manual owner promptly; preserve people, physical and digital evidence without obstructing urgent care or legal duties.
3. Classify the event, assign an owner, document immediate correction and determine customer, worker, community, regulator, insurer, funder or Board notification.
4. Investigate proportionately, identify contributing and systemic causes, approve corrective/preventive action and verify effectiveness before closure.
5. Record authorised deviations with reason, scope, duration, compensating controls and expiry; repeated exceptions require system change or escalation.

7. Records and evidence

Records must be accurate, dated, attributable, legible, protected, retrievable and retained under the approved retention schedule. Personal, customer, community, financial, research and security information receives access proportionate to risk.

Required record	Minimum evidence expectation
Personnel and terms file	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Induction and competence record	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Time and payroll controls	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Safety/worker consultation	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Consent register	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Grievance and safeguarding case file	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Partner labour due diligence	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Exit checklist	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.

8. Performance indicators and management review

Indicator	Review question
Written terms coverage	What does written terms coverage show about effectiveness, risk, trend, root cause and required decision?
Pay on-time/error rate	What does pay on-time/error rate show about effectiveness, risk, trend, root cause and required decision?
Working-time exceptions	What does working-time exceptions show about effectiveness, risk, trend, root cause and required decision?
Training competence	What does training competence show about effectiveness, risk, trend, root cause and required decision?
Safety participation	What does safety participation show about effectiveness, risk, trend, root cause and required decision?
Grievances acknowledged/resolved	What does grievances acknowledged/resolved show about effectiveness, risk, trend, root cause and required decision?
Retaliation allegations	What does retaliation allegations show about effectiveness, risk, trend, root cause and required decision?
Turnover and retention	What does turnover and retention show about effectiveness, risk, trend, root cause and required decision?
Partner corrective-action closure	What does partner corrective-action closure show about effectiveness, risk, trend, root cause and required decision?

The manual owner reviews indicators monthly or quarterly according to risk, reports material exceptions through the management pack and proposes changes during annual management review. A positive metric never overrides evidence of harm, legal breach or stakeholder grievance.

9. Competence, communication and training

- Identify roles that require induction, supervised practice, formal qualification, refresher training or independent authorisation.
- Assess competence through observed performance, records, tests, work results or authorised sign-off—not attendance alone.
- Communicate changes before their effective date and confirm affected users can access the current controlled version.
- Withdraw access or require supervision where competence has expired, changed or proved insufficient.
- Retain training, assessment, authorisation and refresher records.

10. Review, change and approval

Trigger	Required action
Annual review	Confirm continued suitability, legal/contractual alignment, evidence, indicators, incidents and user feedback.

Trigger	Required action
Material incident or audit finding	Review affected control immediately and implement approved corrective change.
Legal, market or system change	Obtain competent review before the new requirement or release becomes effective.
Process/organisation change	Update roles, records, training, permissions and continuity arrangements.
Manual revision	Issue new version, change summary, approval, effective date and superseded-version withdrawal.

Appendix A — Operational templates

The following templates form the minimum annex set. The manual owner may issue controlled electronic equivalents in LaDOS or another approved system.

A.1 Ethical-work induction checklist

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.2 Worker consent form

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.3 Grievance intake form

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.4 Safeguarding risk triage

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.5 Investigation plan

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.6 Remedy and appeal record

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.7 Partner labour checklist

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

Appendix B — Approval

This manual becomes controlled when approved by the authorised Labl Fashion authority. Printed copies are uncontrolled unless specifically registered.

Approved by	Capacity	Signature	Date
	Board Chair / delegated authority		
	Managing Director / Venture Lead		
	Manual owner		