









GUIDANCE DOCUMENT OPERATIONAL PLANNING AND CONTROL



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TRANSLATIONS

Please be aware that in the case of translations of the FSSC 24000 Scheme or Guidance documents, the English version is the official and binding version.

DISCLAIMER

The information in these guidance documents is intended to assist with the interpretation, implementation, and auditing of the requirements contained in the PAS 24000. While this information addresses and is consistent with these requirements, it is not intended to add to, subtract from, or in any way modify them.

The requirements in the PAS 24000 need to be viewed from a systems perspective and should not be considered in isolation, i.e., there can be an interrelationship between the requirements in one clause with the requirements in other clauses.



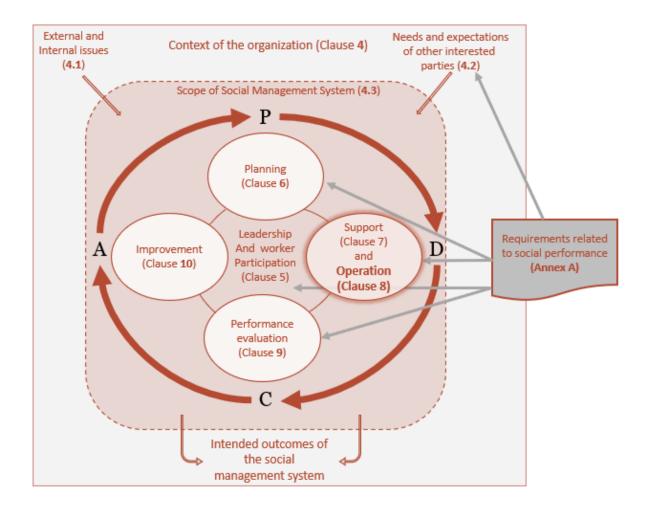
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1. INTRODUCTION

The intent of this requirement is for organizations to operationally deploy the planning carried out under clause 6. Operational planning and control of the processes should be established and implemented where necessary to improve social performance by eliminating or reducing social risks to as low as reasonable levels. The risks and opportunities, and social objectives determined during the planning (PAS 24000:2022, clause 6), including possible changes, are important inputs for consideration in the planning and monitoring of the social performance of the operation, including its (business) relationships, and for setting process criteria.



"When it is obvious that the goals cannot be reached, don't adjust the goals; adjust the action steps."

Confucius



2. EXACT WORDING OF THE REQUIREMENT

PAS 24000: 8.1.1 GENERAL

The organization shall plan, implement, control and maintain the processes needed to meet the requirements of the SMS, and to implement the actions determined in Clause **6**, by:

- a. establishing performance criteria for the processes; and
- b. implementing control of the processes in accordance with the established performance criteria.

Documented information shall be available to the extent necessary to have confidence that the processes have been carried out as planned.

The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

PAS 24000: 5.4 CONSULTATION AND PARTICIPATION OF WORKERS

- e. The organization shall emphasize the participation of non-managerial workers on the following:
 - 6) determining control measures and their effective implementation and use (see 8.1)

3. IMPLEMENTATION

Now that the organization has identified the actions needed to address:

- The assessed and ranked risks and opportunities;
- The legal requirements and other requirements;

It needs to integrate and implement the necessary actions in the processes, to meet the requirements for the realization of the intended output of the SMS. Furthermore, the organization has to establish performance criteria for these processes to control, maintain and update the processes and continual improve the SMS and its social performance.

Depending on the characteristics of the organization, such as the nature of its activities, size, and the nature of the social risks the organization faces, different teams and business units might have been involved in defining the social objectives. These teams and business units should now also be involved in the operational embedding of the actions, these may include¹:

- Those making high-level decisions about the enterprise (e.g. boards and top management).
- Those in charge of compliance (e.g. legal, compliance, human resources, operational management).
- Those making decisions about new business relationships (e.g. sourcing departments, procurement departments, sales departments, investment fund managers.)



- Those in charge of development or oversight of products and operations linked to risk (e.g. product designers, operational and technical leads).
- Those responsible for sales and marketing of products or services.

For example, to ensure participation and consultation of workers, a Multidisciplinary Social Team (MST) could be implemented. This MST should consist of a balanced representation of manager(s) and non-managerial workers from relevant parts of the organization. To enhance worker engagement, the organization could require that the members of the team are elected by the workers. The organization may decide to make the MST responsible for the risk and opportunity assessment only, or at a broader level linking to the overall development, implementation and maintenance of the SMS, including the effective implementation of control measures to eliminate or reduce social risks to as low as reasonable levels.

Either way, the standard requires participation of non-managerial workers in the determination, operational planning and implementation of control measures and a team-based approach can be an important step in building an internal understanding of human rights and their importance to the company. It can help engage colleagues within the company who may be sceptical about the relevance of human rights, but whose support might be essential for effective actions to address the risks and opportunities.

In order to embed the actions, these actions should become part of the regular business processes. The actions could be addressed individually or grouped based on a topic (OH&S) or process (procurement).

Taking this in account, the organization should:

- 1. Identify per action the (existing or new) business process in which the action should be integrated;
- 2. Group the actions that are closely related based on the topic or process;
- 3. Identify how best to integrate the actions into the identified business process(es).
- 4. Encourage alignment across teams and business units on relevant topics. Consideration should be given to the potential independence, autonomy and legal structure of the involved parts / oversight bodies of the organization, that may have been foreseen in local law and regulations¹.
- 5. Determine how the business process should be controlled. Examples of operational control of the processes include²:
 - a. the use of procedures and systems of work;
 - b. ensuring the competence of workers;
 - c. establishing preventive or predictive maintenance and inspection programmes;
 - d. specifications for the procurement of goods and services;
 - e. inclusion of social conditions and expectations in provider or business relation contracts or other forms of written agreements;



- f. application of legal requirements and other requirements, or manufacturers' instructions or equipment;
- g. engineering and administrative controls;
- h. adapting work to workers; for example, by:
 - i. defining, or redefining, how the work is organized;
 - ii. the induction of new workers;
 - iii. defining, or redefining, processes and working environments;
 - iv. using ergonomic approaches when designing new, or modifying, workplaces, equipment, etc.
- 6. Establish performance criteria for controlling that process by which the social risk would be addressed;
- 7. Plan the implementation of the (adapted) business process and control measure and implement in such way that no unintended adverse social impact will occur;
- 8. Develop or adapt existing information and record-keeping systems to collect information on these business processes and control measures to enable monitoring.

UNINTENDED CHANGES & CONTINGENCY PROCEDURE

Situations may arise that disrupt business operations and may lead to unintended changes in the operation to anticipate the situation of contingency. The organizations should:

- 1. Assess the potential adverse social impact of unintended changes to the core processes due to events that could seriously jeopardize its business continuity.
- 2. Identify the minimum requirements the organization should comply with in case of contingency, based on its social policy and the requirements of the PAS 24000:2022;
- 3. Identify evaluation methods per minimum requirement;
- 4. Determine appropriate actions and remediation in case of not meeting the minimum requirements;
- 5. Integrate the minimum requirements, evaluation methods, actions and remediation in the contingency procedure;

4. AUDITING

Operation is the clause in which the organization is expected to ensure social impact, not only as part of processing, manufacturing and service provision, but within all possible business processes necessary to eliminate, or reduce social risks to the lowest possible level. Auditors should examine whether different teams and non-executive workers have participated in determining business process controls necessary to meet the requirements of the SMS.



Auditors should examine whether the organization:

- Determined in which processes the actions, identified in clause 6, should be integrated;
- Established performance criteria needed to ensure control of these processes;
- Implemented control of the processes in accordance with the performance criteria.

Auditors should examine whether the organization has a contingency procedure and how the organization ensures that the consequences of unintended changes are reviewed, and possible adverse social impact is mitigated.

The auditor should note that the organization has to determine the extent of documented information needed, to provide objective evidence that the processes are carried out as planned. There is no specific requirement in FSSC 24000 on how to document (the results of) the control of processes and the established performance criteria.

An organization's needs for, and the extent and type of, documented information will vary greatly due to the context of the organization, its size, culture, nature of products and services, applicable statutory and regulatory requirements, and/or customer requirements regarding the risks on products, etc.



ANNEX 1 BIBLIOGRAPHY

- 1. OECD (2018), OECD Due diligence guidance for responsible business conduct.
- 2. ISO 45001:2018, Occupational health and safety management systems Requirements with guidance
- 3. Shift, Oxfam and Global Compact Network Netherlands, "Doing Business with Respect for Human Rights: A Guidance Tool for Companies," 2016.
- 4. United Nations, UN Guiding principles on business and human rights, New York and Geneva, 2011.