



BWF Code of Conduct & Guide to Compliance



The BWF Code of Conduct aims to provide specifiers, end-users and their suppliers with greater confidence that the Member is working to a set of principles of good practice, set out in this document.

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1.0 Scope of the Code of Conduct

- 1.1 All full Members of the British Woodworking Federation (the BWF) are required to comply with this Code of Conduct as a condition of membership.
- 1.2 The Code of Conduct and the associated guidance is subject to regular review and development to meet Members' changing needs in the woodworking industry.

2.0 Primary (Full) Membership

- 2.1 Primary (Full) Membership of the BWF is open to all UK based companies and individuals engaged in the manufacture, modification and installation of joinery, timber structures and components or other woodworking products.
- 2.2 Primary Members shall accept and comply with the BWF Constitution, Rules and Code of Conduct.
- 2.3 Members shall do whatever is necessary to ensure that their employees are aware of this Code of Conduct, and shall use their best endeavours to ensure that their employees observe the Code where relevant.
- 2.4 Members shall assist the BWF in the enforcement of this Code of Conduct.
- 2.5 The BWF encourages all its Members to adopt and maintain systems of quality management for the products or services they supply.
- 2.6 All BWF members will receive an annual membership certificate. An additional Code of Conduct certificate will be sent through when the company has been subjected to a Code of Conduct assessment and deemed to comply with the Code of Conduct. Should a member company be found no longer to meet the standards of the Code, their compliance certificate will be withdrawn, until the agreed corrective action/s has/have been successfully completed.

3.0 Code of Conduct

- 3.1 On approval of the company's Membership of the BWF, in accordance with the rules of the BWF, a Code of Conduct Assessor will arrange a meeting at the company's premises to carry out an assessment of whether the applicant complies with the standards set out in the BWF Code of Conduct.

A Member is defined as an organisation or individual engaged in the manufacture or site installation of wood-based products, such as doors, windows, staircases, conservatories, etc. This list is not intended to be exclusive and the BWF acknowledges that a wide range of products might be manufactured and/or installed by Member companies.

- 3.2 To ensure that Members are complying with the Code of Conduct, the BWF will organize periodic assessment visits to sample Code compliance approximately once every four years. The BWF has absolute discretion to insist on more frequent visits if it considers it necessary in specific cases.

The Code of Conduct sets out the principles of good practice for a woodworking or joinery business and represents the standard to which all members have committed themselves to achieving. The aim of the Code is to set standards and ensure that BWF Members are complying with them.

It is a condition of membership that the organisation continues to comply with the requirements of the Code of Conduct. Any shortcomings identified during such an Assessment visit must be rectified within an agreed period and a further visit may be arranged, for which a charge will be made. The BWF will offer advice and assistance to help a Member reach the required standard. When the BWF is able to confirm compliance, the Member will be issued with a compliance certificate.

Assessment visits may be arranged at the BWF's discretion, to verify compliance. Persistent or willful failure to comply with the Code of Conduct may lead to disciplinary action by the BWF Council, which may include withdrawal of membership.

In the event of a company postponing, cancelling or missing a visit at short notice, the BWF will incur costs, some of which will be passed on to the members company. The following fees (plus vat) will be incurred by the member in the event of a cancellation, postponement or missed visit

- *On the day: £175;*
- *Day before visit is set to take place: £87.50;*
- *Within 5 working days of the arranged date: £50 unless another visit can be arranged or rescheduled within same trip subject to the BWF Code of Conduct Assessor's approval.*

- 3.3 Members must pay all membership fees promptly in accordance with current BWF subscription procedures to ensure continuing membership. The BWF Council may alter the subscription rates or procedures as and when it thinks it is appropriate.

4.0 Complaints By/Or Against Members

- 4.1 Failing to comply with the obligations and duties in this Code of Conduct may result in the Member being expelled from membership of the BWF.
- 4.2 Complaints against a Member relating to their compliance with the Code, or by any Member against another may be investigated by the BWF Code of Conduct Committee.
- 4.3 If the BWF examines an alleged breach of this Code by a Member, and finds that the Member has breached the Code, it shall take such action as it deems necessary.

A complaint against a Member arising from an alleged breach of this Code, which cannot be adequately resolved by the BWF's Member Dispute Resolution Service, will be recorded by the BWF Secretariat and may be submitted to the Code of Conduct Committee for adjudication and resolution. The Member concerned will be advised in writing as soon as possible and given every opportunity to present their case. A copy of the procedure describing how complaints are investigated and resolved will be provided.

The Code of Conduct Committee comprises the BWF Officers, and is chaired by the Immediate Past President ex-officio.

The purpose of this Code is to set and maintain standards in the woodworking industry, not to penalise. The Code of Conduct Committee will, wherever possible, seek rectification of any justified complaint and a commitment from the Member to ensure that there is no repetition.

Appeals against the outcome of an assessment, as well as any complaints which may arise about the conduct of an assessor, will also be recorded by the BWF Secretariat and submitted to the Code of Conduct Committee. Members concerned and the assessor will be given a copy of the procedure describing how appeals and complaints are investigated and resolved.

Members of the Code of Conduct Committee shall not participate in the investigation or resolution of any complaint against themselves or any organisation with which they are involved.

5.0 Business Requirements

- 5.1 Members shall provide evidence of the financial status of their businesses when applying to join the BWF and at subsequent assessment visits.

In applying for membership, applicants undertake to ensure that they have the financial resources to carry out and complete a contract satisfactorily and, if necessary, deal with any matters arising after completion. Specific requirements are set out in sections 5.2., 5.3., & 5.4.

- 5.2 Members shall be registered for VAT.

During an initial assessment or periodic visit, the assessor would expect to see a copy of the organisation's original certificate of registration for VAT and/or current evidence in the form of recent VAT Returns.

- 5.3 The BWF requires Members, whether companies or individuals, to have traded for at least two years or to provide evidence of successful experience in a relevant industry.

The assessor would expect to see one or more of the following:

- Evidence of a fixed address from which the business is conducted;
- Copies of the organisation's accounts for two years with appropriate evidence of auditing by an accountant;
- In the event that accounts are not yet complete for two years, evidence of a suitable reference from the organisation's bankers or accountants;
- In the case of self-employed individuals, a copy of the self-assessment or self-employment forms as provided by the Inland Revenue.

In the case of organisations which have been active for less than two years, the assessor would expect to see evidence of the following:

- Evidence of previous employment or involvement of the principals in an appropriate capacity in the woodworking industry;
- A suitable reference from the organisation's bankers or accountants;
- A meaningful business plan.

5.4 Applicants will arrange for references to be provided.

The BWF will seek four references (3 customers and 1 major supplier) in advance of the initial visit. It is the responsibility of the applicant to ensure such references are provided. The BWF Secretariat will follow up all references and record the referee's comments.

It is important that the reference information describes the nature of the products manufactured and/or installed, with an indication of the approximate value. The referee will be asked to confirm these facts and express their level of satisfaction with the quality and timeliness of the work done. Applicants may submit brief photographic evidence with their reference information.

In judging the suitability of references, the BWF will take into account whether the project is typical of the type and size of work generally undertaken by the applicant.

5.5 All Members shall maintain appropriate insurance cover.

- Members shall provide evidence of a current Public Liability Insurance policy;
- Members shall provide evidence of a current Employers Liability Insurance policy;
- Where applicable, Members shall provide evidence of Premises Insurance.

6.0 Health & Safety

- 6.1 Members shall be aware of all health and safety matters which affect their activities and promote understanding of these amongst their employees and clients.

It is not the job of an assessor to undertake a health and safety audit or to judge compliance with any legislation.

The assessor should establish that the Member is aware of the relevant legislation and the obligations that this imposes on the conduct of business activities. Amongst the many facets of an effective health and safety policy, which must reflect the nature of each individual organisation, the Assessor would expect to see at least the following:

- Health & Safety Poster;
- The legal requirement for an appropriate Health and Safety policy, if the organisation employs five or more people. This should be clearly displayed as evidence that it is communicated to all employees;
- An understanding of the hazards associated with their activities. The most convincing evidence of this would be records of regular risk assessments being carried out and acted upon. This is particularly important for woodworking machinery operations. Further evidence might be a recent audit carried out by the HSE and a clear understanding of any compliance issues arising from it.

Further evidence of an effective health and safety policy would be demonstrated by the following key features being in place:

- A current copy of the 'BWF Guide to Health and Safety in the Woodworking Industry' available and in use, together with properly displayed **BWF Machinery Safety Cards**;
- The required numbers of employees with appropriate first aid training available at all times and evidence of suitable first aid facilities;
- Signs indicating hazards or the need for caution;
- Clear gangways, entrances and exits and a generally tidy production area;

- A formal process of Health and Safety instruction for new employees and records of this having taken place;
- A formal procedure for reassessing all existing employees annually and records of any training undertaken as a result;
- Awareness of the Construction (Design and Management) Regulations and how these affect product design, site or installation work. This could be demonstrated by the provision of additional health and safety information and/or equipment relevant to these operations.

Members who operate a third-party accredited health and safety system to ISO45001 will be deemed to meet all of the requirements of section 6.1.

7.0 Employment Practice (Training)

7.1 Members shall comply with relevant employment legislation and codes of practice.

It is every organisation's legal duty to comply with employment legislation. The BWF Assessor will not check that compliance is being achieved, but can provide advice in the form of checklists to help organisations to understand what they must do. This advice is available to Members at any time from the BWF Secretariat.

7.2 Members shall ensure that their employees have the appropriate levels of expertise for the efficient and safe conduct of their tasks and if necessary will provide the necessary training to achieve that.

Members shall have a written policy regarding the training needs of all employees and appropriate methods of assessing their training needs. This policy shall also show a commitment to ensuring that all employees are properly trained and provided with opportunities to develop their skills and experience. Assessors will wish to see documentary evidence of the regular training needs reviews, the setting of individual training goals where appropriate and their achievement.

Members who operate a third-party accredited quality assurance system, such as ISO9001, or are accredited to the 'Investors in People' © standard will be deemed to meet all of the requirements of section 7.2.

Members shall demonstrate a commitment to the training of new entrants to the industry. This may vary according to the size and nature of a Member's operation and local circumstances, particularly the availability of local training establishments.

8.0 Technical

- 8.1 Members shall comply with all current European, National and Industry standards and regulations which are relevant to the products and services they provide.

Members shall maintain and keep up to date, relevant British Standards, Building Regulations and industry/trade standards applicable to their field of operations.

The BWF expects that Members will be aware of, and have access to, the relevant British and/or European standards. At the very least, every Member will have a copy of: **BS EN 942 Timber in Joinery. General requirements**

The Assessor will judge which documents should be held by referring to information sources such as the 'Business Activities' section of the application form or the company website. If the Members do not hold copies of these standards, they will be required to demonstrate how an understanding of relevant standards is achieved and applied throughout the various stages of the order process from enquiry to delivery and/or installation.

The Assessor will judge which documents should be held by referring to information sources such as the 'Business Activities' section of the application form or the company website. If the Members do not hold copies of these standards, they will be required to demonstrate how an understanding of relevant standards is achieved and applied throughout the various stages of the order process from enquiry to delivery and/or installation.

The BWF actively encourages Members to seek its advice about any standards, regulations or codes of practice which affect their business activities.

Assuming they have copies of the appropriate standards documents, Members operating a third-party accredited quality assurance system, such as ISO9001, will be deemed to meet all of the requirements of section 8.1.

If manufacturing joinery products within the scope of CE Marking, Members should have a written Factory Production Control System in place and be capable of producing a CE label and declaration of performance for these products.

9.0 Environmental

- 9.1 Members shall use their best endeavours to minimise and manage waste and avoid pollution by disposing of waste in a controlled and appropriate manner.

All manufacturing processes involve production waste to some degree. Manufacturing Members shall endeavour to:

- Minimise waste by constantly seeking to improve production processes;
- Ensure appropriate waste control procedures which avoid pollution of the environment are used;
- Provide for the controlled disposal of all waste in an approved manner.

Evidence of an organisation's efforts to manage waste effectively could be found in any or all of the following ways:

- Responsibilities for waste management clearly defined within the management hierarchy;
- Awareness of the volumes and values of waste produced within the production process;
- A waste management policy and/or targets for improvement;
- A minimal amount of waste visible in production areas;

- Appropriate storage containers and collection facilities, including effective dust extraction;
- Use of water-based paints, finishes and other chemicals;
- Separation of materials for recycling;
- Selling on of waste for alternative use;
- Internal use of waste to generate energy, for example in heating systems or electricity generation.

Members who operate a third-party environmental management system, such as ISO14001, will be deemed to meet all of the requirements of section 9.1.

10.0 Sustainability

- 10.1 Members shall use their best endeavours to provide products which meet sustainability best practice and must ensure that the transactions that they make are in compliance with the EU Timber Regulation.

All Members are expected to use product designs, materials, manufacturing processes, treatments and coatings, etc., which will provide long-life, low-maintenance products which are fit for purpose. Where Members do not install, site glaze or site finish their products, they are expected to provide appropriate written installation, core and maintenance instructions.

- 10.2 Members shall use their best endeavours to purchase timber and wood based products from sustainable sources.

All Members will be expected to use their best endeavours to purchase new timber or wood based products from supply sources which can confirm, by independent certification such as the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), or any other recognized system that proves that such products come from well-managed sources.

Assessors will seek evidence that organisations are trying to meet the spirit of this clause. This could be found in the text of purchase contracts and purchase orders, as well as correspondence with suppliers about the availability of products from sustainable sources.

Assessor will seek evidence that, if asked to supply a product in a species which cannot be obtained from certificated sources, the Member has sought to offer a comparable alternative.

11.0 Contracts

11.1 Members shall use written contracts wherever it is reasonable to do so. Contract terms should always be clearly stated in language which can be understood by the Members themselves and their clients.

Members shall:

- Provide written quotations for all contracts. Quotations should include an explanation of conditions of sale and a request for written confirmation of any order. Verbal orders should be confirmed in writing by the member;
- Provide clients with delivery dates if requested - subject to the client providing all necessary contract information within an agreed time period;
- Provide clients with written confirmation of any changes to contract details which are made or called for by the client, indicating changes in quotations, effects on contract time schedules, additional work etc.

- Supply sufficient information at the commencement of a contract to satisfy the client's needs. This information should include all relevant prices, rates and extras, technical information (including technical product literature, if necessary) and additional options, if relevant. Care should be taken to describe exactly what the quotation covers and excludes;
- Provide the general public with quotations which reflect their lesser technical knowledge. All wording should be self-explanatory and avoid an overly technical bias;
- Where relevant, make clients aware of the current health and safety regulations. The appropriate information should be included in each quotation;
- Where appropriate, supply products with advisory sheets covering installation, decoration, protection, maintenance and packaging waste disposal.

If a written contract is not used for any reason, Members should ensure that they have explained the nature of the work they have agreed to undertake, the price and the delivery date, and that this agreement forms a contract.

Assessors would expect to see evidence of all of these within the records and documents comprising the estimating, quotations and sales order processing routines.

Members who operate a third-party accredited quality assurance system, such as ISO 9001 will be deemed to meet all of the requirements of section 11.1.

12.0 Customer Care

- 12.1 Members will act fairly and equitably in dealing with their customers, meeting proper standards of workmanship, integrity and courtesy.

Every effort must be made to complete contracts on time, to the price agreed and to the satisfaction of the client or their representative. It is recommended that all goods manufactured for 'supply only' contracts are signed for at the time of hand over to the customer. In the case of installation work, it is recommended that this 'signing off' be formalised by a signed document. In the event of any complaint, the following

procedure should be adopted:

- All complaints must be dealt with promptly, usually within 10 working days;
- Remedial action shall be agreed usually within 10 working days of the initial inspection.

It is recommended that Members should have written records of the complaint, formal records of any subsequent site or product inspections, as well as the steps taken to resolve the matter. Assessors will look for evidence of complaints being dealt with positively and promptly.

Members who operate a third-party accredited quality assurance system, such as ISO9001 will be deemed to meet all of the requirements of section 12.1.

13.0 Advertising and Use of the BWF Logo

- 13.1 Member companies shall not use or allow inaccurate information or misleading statements to be used in promotional or advertising material.
- 13.2 To preserve the integrity of the BWF brand, we ask that the BWF Member Brand Guidelines are adhered to.
- 13.3 Use of the BWF logo is a visual mechanism to show that the business is a member of the BWF; it should not be used in any way that implies the following:
- That the BWF endorses a product, a process or an individual;
 - That any particular level of product performance is guaranteed or assured.

APPENDICES

APPENDIX 1: Member Compliance to COSHH – A Focus on LEV

As part of the BWF Code of Conduct, members have to demonstrate compliance with Health & Safety Legislation, including the control of Substances Hazardous to Health Regulations 2002 (COSHH).

For those in the woodworking industry, the control of wood dust and fumes from spraying booths can be challenging and the installation and maintenance of an appropriately specified Local Exhaust Ventilation (LEV) system is crucial.

Under the COSHH Regulations it is a legal requirement for a woodworking workshop / manufacturing site to have a LEV system installed to reduce employee exposure to airborne contaminants that might be hazardous to health. The Regulations also require those responsible for any wood dust extraction equipment make a written assessment of the risks to health associated with wood dust, together with any action needed to prevent or control those risks.

Wood dust is a real concern as it is known to cause serious health problems, such as asthma. Astonishingly carpenters and joiners are four times more likely to get asthma compared with other UK workers. The BWF Code of Compliance requires all members to undertake regular LEV testing to meet their legal obligations under the COSHH Regulations, as well as to demonstrate compliance with the following wood dust maximum workplace exposure limits (WEL):

- Hardwood – 3 mg/m³ (8-hour time-weighted average);
- Mixed wood dust – 3 mg/m³ (8-hour time-weighted average);
- Softwood dust – 5 mg/m³ (based on an 8-hour time-weighted average).
- The servicing of equipment and the provision of a LEV report at least every 14 months.

As we previously reported in July, HSE Dust Control Inspectors have started visiting sites across the UK to assess how they are controlling dust and they are specifically focusing on the woodworking sector. Whilst we check compliance for the Code of Conduct, we wanted to reiterate the following:

- The employer (the LEV owner) is required to provide dust extraction controls at woodworking machines to capture and remove dust before it can spread;
- Employers must also ensure that all operators and supervisors have received adequate training in the correct use of LEV;
- The employer must consider other control options and use them where appropriate before applying LEV. In some circumstances, the number of sources or quantity of dust might be too large for LEV alone to control.
- Employers should also consider how to:
 - eliminate the source
 - substitute the material being used by something safer
 - reduce the size of the source
 - modify the process to reduce the duration or frequency of emission;
 - reduce the number of employees involved with a process

Please note, COSHH Regulations apply to the Self-Employed, except Regulations 10 & 11 (those about monitoring and health surveillance).

For further guidance on wood dust visit the HSE Guidance and the BWF website:

<https://www.hse.gov.uk/coshh/industry/woodworking.htm>

<https://www.bwf.org.uk/publications/health-and-safety/>

APPENDIX 2: CE Marking

What is CE Marking?

From 1 July 2013, under the Construction Products Regulation (CPR), it became mandatory for manufacturers to apply CE marking to any of their products covered by a harmonised European standard (hEN) or a European Technical Assessment (ETA).

The regulation gives a framework for assessing how to test and classify products - CE marks on construction products should signpost consumers to the Declaration of Performance, which will show that the product meets their specific requirements.

Put simply, CE marking is a legal requirement applied to manufacturers of windows and external doorsets.

The mandatory CE marking of external fire doorsets came into effect on 1st November 2019 and mandatory CE Marking of internal fire doorsets is expected to follow.

How do I know if I need CE Marking?

If the product that you manufacture needs to comply with building regulations, it will require a U-Value calculation – if it falls within building control and requires a U-Value calculation it will need to be CE marked.

BUT, there are exemptions for some products made in a traditional, non-industrial way for heritage and restoration projects. Bespoke joinery typically falls under the category of 'eco-design of energy related products'. This includes external windows & doors.

I need CE marking but what is the process?

The first step is factory production control (FPC.) They can look daunting at first but you can work through gradually using the free to members CE Marking templates. Visit <https://www.bwf.org.uk/publications/ce-marking>

The next step are U-Values, we have support documents (see <https://www.bwf.org.uk/toolkit/product-energy-performance/>) available to help and the



BWF are able to carry out basic U-Value calculations, at special discounted rates, for you if you have a standard design for casement or vertical sliding sash windows. When you are ready, download the data forms (see <https://www.bwf.org.uk/toolkit/product-energy-performance/>) and send to us at bwf@bwf.org.uk.

The final step, is a Declaration of Performance (DOP) and CE Marking labels for micro-business for windows and doorsets. We have downloadable templates here – see <https://www.bwf.org.uk/publications/ce-marking/> For more general information regarding CE Marking, please see the BWF website at: <https://www.bwf.org.uk/toolkit/preparing-your-joinery-manufacturing-business-for-ce-marking/>

APPENDIX 3: Training and Training Records

The woodworking industry has one of the highest accident rates in manufacturing. By the very nature of how wood behaves as a material and the type of equipment used, woodworking poses a significant risk of injury.

The Provision and Use of Work Equipment Regulations 1998 (PUWER) relates to general work equipment, but also recognises that an Approved Code of Practice (ACOP) and guidance specific to woodworking machinery was necessary.

The ACOP text and associated guidance provide practical advice on how you can comply with the requirements of PUWER can be found at <https://www.hse.gov.uk/work-equipment-machinery/puwer.htm>

The Health and Safety at Work etc Act 1974 requires you to provide whatever information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of your employees. <https://www.hse.gov.uk/legislation/>

Members should demonstrate a commitment to the training of new entrants to the industry. This may vary according to the size and nature of the members operation. Members are expected to have a written policy regarding the training needs of all employees in particular to the HSE training requirements.

Note that HSE require all staff to have refresher training at least every 3-5 years, regardless of experience.

Poor supervision and inadequate training are two of the main causes of accidents. The Law requires that all workers must receive adequate training and refresher training. It also makes good business sense to make sure your employees are working efficiently and safely.

More information can be found at <https://www.hse.gov.uk/simple-health-safety/training/index.htm>

Who should be trained?

- Machine operators
- People who assist in the machining process (taking off, feeding and loading)
- People who set, clean and maintain the machines.

The training and supervision needs for each operator will vary. You will need to assess their needs carefully and make sure that training is appropriate for their age and experience.

When should training be given?

New starters are likely to have the greatest training needs. You also need to think about refresher training for trained, qualified and experienced operators at least every three to five years, sooner if a risk assessment identifies a particular training need. Operators can lose some skills if they don't use them regularly.

Who needs refresher training?

Refresher training is important:

- For operators who 'stand-in' occasionally for the regular operator - at least every three years;
- For someone coming back to a machine they have not used for a while;
- When the system of work changes;
- When new controls have been fitted;
- When new machines or equipment have been brought in;
- After an incident or near miss to show how the incident can be avoided in future;
- After any change in legislation or new guidance;
- For all staff every three to five years.

Keeping Training Records

Once the operator has received the necessary training and has demonstrated their competence, it is good practice to authorise them in writing for the machines and operations that they can use.



More information can be found at <https://www.hse.gov.uk/woodworking/training.htm> The BWF Code of Conduct specifically requires that training records cover job specific, H&S training and generic skills such as correct use of PPE, lifting aids and extraction equipment.

A BWF sample training policy can be found at <https://www.bwf.org.uk/publications/bwf-code-of-conduct/>

The BWF Health & Safety Manual intended to help all members meet the duties that are placed upon them under health and safety legislation. It represents the most comprehensive single guide to the legislation, regulation and best practice within the industry. It can be downloaded at <https://www.bwf.org.uk/publications/health-and-safety/>