

**Social and Labor Convergence Program (SLCP)
Quality Assurance Manual
Version 2.3**

26 April 2023

This QA Manual explains SLCP's approach to data quality and integrity and provides detail on QA procedures maintained and executed by the Verification Oversight Organization.

Disclaimer: This file represents only one aspect of the SLCP data quality and integrity framework. The file should be viewed in conjunction with SLCP's Verifier Body Terms of Use, Verifier Body Requirements and Verification Protocol.

Change Log

This document will be updated on an as-needed basis. Whenever there is an update, VBs are informed through technical bulletins and webinars.

Date	Section	Change Summary
03/30/ 2022	All	Changed must to shall
03/30/ 2022	All	Changed working days to business days
03/30/ 2022	All	Changed outline structure to 10 chapters. Key QA activities and procedures are contained in three Chapters: Quality Assurance Related to Establishing Qualified and Trained Personnel Quality Assurance Related to SLCP Process Oversight Quality Assurance Related to Continuous Improvement
03/30/ 2022	Section 1	New information for user to see SLCP data quality and integrity systems at a glance, including SLCP's guiding principle, goal, and general framework
03/30/ 2022	Section 2	Specific information on other documents related to Verifier and Verifier Body requirements
03/30/ 2022	Section 3	New section titled: Quality Assurance Related to Establishing Qualified and Trained Personnel New information on APSCA/ non-APSCA member differentiation for VB application and Verifier application, VB and Verifier performance scoring, VB expansion to additional countries, VB status maintenance, Verifier Status Maintenance Program, and appeal process New information on access to public data
03/30/ 2022	Section 3.11.3	Verifier training courses may be offered in other languages (e.g., the SLCP 7 e-learning modules), but the English language training course is mandatory
03/30/ 2022	Section 4	New section titled: Quality Assurance Related to SLCP Process Oversight New information on automatic process oversight, SLCP verification observation by stakeholders, access to public data
03/30/ 2022	Section 4.2.5 onwards	Update to post Desktop Review process for Verifier to make report changes due to new assessment status VRE Increase edit time to 5 calendar days
03/30/ 2022	Section 4.3	Clarification that Counter Verifications can be conducted by the VOO or a VB; preference for VOO to conduct Counter Verifications Summary of the Counter Verification Report is only shared with the facility and not the VB of the initial verification
03/30/ 2022	Section 4.4	Summary of the Duplicate Verification Report is only shared with the facility and not the VB of the initial verification
03/30/ 2022	Section 5	New section titled: Quality Assurance Related to Continuous Improvement New information on APSCA Partnership, QA Stakeholder Program, access to public data
03/30/ 2022	Section 5.2	Update to Dispute process for Verifier to make report changes due to new assessment status VRE Increase edit time to 5 calendar days
03/30/ 2022	Section 6	Updates on Bribery and Unethical Behavior to include facility-led bribery and outcomes of bribery/unethical behavior and VOO tracking
03/30/ 2022	Section 7	Invalidation pulled out as its own topic/ section; still referenced in each QA activity, but section 7 explains process of invalidation better
03/30/ 2022	Section 8	New section on Post VRF changes – addition of VOO addendum to Gateway report; changes to the verified data set in exceptional circumstances with permission of the VOO
03/30/ 2022	Section 9	New section on Public QA Communications
03/30/ 2022	Appendices	Updates to all Appendices:

		<p>Removal of Appendix on QA Flags; note that the flags are reviewed continually and change along with requirement/ procedure updates and program feedback received by SLCP users; therefore, a static list is no longer applicable</p> <p>Appendix I VB & Verifier Selection Process updated; indemnity form no longer required</p> <p>New Appendix II VB Full Approval Process</p> <p>Appendix III Criteria of Report Invalidation; was previously named “Extreme Cases”; more details added</p>
14/03/2023	Section 3.12	Clarification on the timeline to review Verifier equivalence requests.
14/03/2023	Section 4.3	Removal of the final Counter Verification report; therefore, the summary for facilities is no longer applicable.
14/03/2023	Section 4.4	Removal of the paragraph related to final Duplicate Verification report; addition of information regarding the summary of the Duplicate Verification sent to the facilities.
14/03/2023	Section 4.5	Clarification added on VOO sharing the Shadow Verification report with the VB employing the Verifier only if there are any reasonable reportable issues.
14/03/2023	Section 5.3	Clarification added on complaints regarding verifications over 2 years old and their utilization.
14/03/2023	Section 5.3	Clarification added on the timeline for VOO complaint review.
14/03/2023	Section 5.3	Clarification added on complaint outcomes.
14/03/2023	Section 5.5	New section on how to report confidential and sensitive information to SLCP and VOO.
14/03/2023	Section 6	New section titled Unethical Behavior. New definition of unethical behavior added; new procedures on how handle other types of unethical behavior that are not facility-led bribery added; new definition of Verifier behavior added; new procedures for handling cases of unethical Verifier behavior; definition of unethical Verifier Body behavior added.
14/03/2023	Section 8.2	New information on report error addenda included.
14/03/2023	Section 8.3	New information on important addenda findings included.
14/03/2023	Appendix	New Appendix on complaint handling process and timelines

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Glossary

“Accredited Host” Third party/ external service provider approved by SLCP to store SLCP assessment data on their platform and provide additional data analytics and sharing services to users such as brands, standard holders, and manufacturers.

“Active Accredited Host” Third party/ external service provider approved by SLCP to 1) provide a technology platform to allow data entry by facilities and Verifiers during the SLCP assessment and verification; 2) store SLCP assessment data on their platform and 3) provide additional data analytics and sharing services to users such as brands, standard holders, and manufacturers. The SLCP CAF Assessment Process must be completed on one of the Active Accredited Host platforms a facility can choose which one they want to use.

“CAF Assessment Process” means a procedure, as developed in the context of SLCP, serving to implement the Converged Assessment Framework, starting with self/joint-assessment for facilities that is augmented via verification by external parties and verification oversight and a methodology for data sharing by the facility, Verifier and Accredited Host via the ITC Gateway.

“Converged Assessment Framework” or “CAF” The Data Collection Tool and verification methodology, developed by SLCP and downloadable from the Gateway. Consists of three elements: 1. Data Collection Tool; 2. Verification Protocol; and 3. Guidance (Facility, Verifier).

“Data Collection Tool” or “Tool” Element 1 of the Converged Assessment Framework. ‘Questionnaire’ used to gather data on working conditions in a facility and used by the Verifier to verify this data. Contains all the assessment questions that a facility shall answer through a self/joint-assessment. When completed, includes the answers by the facility and the Verifier. Can be filled in online on an Accredited Host platform or offline through an Excel file downloadable from an Accredited Host.

“ITC Gateway” or “Gateway” The central repository of SLCP verified assessments. All verified assessments are stored safely on an UN server. Registered facilities have access to their verified assessments at all times and can download these. Apart from this the Gateway serves 4 critical functions:

1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material
2. Account Management and unique IDs for facilities, VBs, and Verifiers
3. Management of statuses of the SLCP assessment cycle – by continuous updates with each of the Accredited Hosts. Facilities can see the status of their SLCP assessment throughout and at all times.
4. Re(distribution) of verified assessments (VRF status) to Accredited Hosts and other ad-hoc users, with facility permission.

“SLCP” means the Social & Labor Convergence Program (SLCP), an independent multi-stakeholder program which has developed the Converged Assessment Framework (CAF) and a data hosting and sharing process.

“SLCP Requirements” are the requirements contained in all documents associated with management of SLCP’s data integrity and quality. The main documents are the Quality Assurance Manual, Verifier Body Terms of Use, Verifier Body Requirements, and Verification Protocol.

“Verification Oversight Organization (VOO)” Entity responsible for the day-to-day management of SLCP verifications. It manages the selection of VBs and Verifiers (qualification criteria, application and approval process), maintains an updated overview of SLCP approved Verifiers and associated VBs on the Gateway, sets Quality Assurance (QA) procedures in collaboration with SLCP, executes QA activity, develops the scoring system for SLCP approved Verifiers and VBs, collects Verifiers’ performance data, provides verification support desk for all SLCP system users, gathers feedback from SLCP system users, and handles dispute resolution between a facility and a Verifier.

Converged Assessment.
Collaborative Action.
Improved Working Conditions.

“Verification Protocol” Element 2 of the Converged Assessment Framework. The document that contains the procedures, rules, and process requirements for conducting an SLCP verification.

“Verified assessment” uses the CAF and follows the CAF Assessment Process and results in a report in pdf, Excel and html format made available to facilities and shareable by facilities on the ITC Gateway.

“Verifier” Person qualified to perform an SLCP verification to ensure the completeness and accuracy of the data collected through self/joint-assessment of facilities, using the CAF.

“Verifier Body” The organization to which a Verifier belongs. Is responsible for assigning Verifiers when an SLCP verification is requested.

“Verifier Guidance” Element 3 of the Converged Assessment Framework. The document that helps Verifiers complete the verified assessment report by giving guidance on how to verify a facility’s answers to questions in the Data Collection Tool.

Converged Assessment.
Collaborative Action.
Improved Working Conditions.

Acronyms

AH	Accredited Host
ASC	Assessment Completed
ASI	Assessment Initiated
CAF	Converged Assessment Framework
ITC	International Trade Centre
QA	Quality Assurance
SLCP	Social and Labor Convergence Program
VB	Verifier Body
VBs	Verifier Bodies
VOO	Verification Oversight Organization
VRC	Verification Completed
VRD	Verification Disputed
VRE	Verification being Edited
VRF	Verification Finalized
VRI	Verification Invalidated
VRP	Verification in Progress
VRQ	Verification Quality Check

1. Introduction to SLCP Quality Assurance

1.1 Guiding Principle, Goal and Outcomes of SLCP QA

SLCP's **guiding principle to data integrity and quality**: SLCP commits to nurturing, maintaining, and evolving a Program that delivers credible, trustworthy, quality data enabling insights, integration, and comparability.

Our goal is to drive trust, confidence, and credibility of SLCP and its data through comprehensive and rigorous processes that improve rigor, consistency, quality, and integrity of SLCP verifications and verified data over time.

We support our goal with qualified personnel, implementation and oversight of comprehensive processes and continuous improvement measures. Key outputs are as follows:

- 1) only qualified parties, entities, and personnel implement all of the SLCP activities;
- 2) consistent, systematic, transparent, and documented implementation of procedures;
- 3) comprehensive and rigorous processes application with quality, consistency, and precision in mind; and
- 4) continuous personnel, tools and system improvement using feedback loops, partnership leverage, collaboration, and engagement of stakeholders.

Data integrity and quality systems

DO:

Monitor, measure, evaluate and improve consistency and precision of processes to arrive at trustworthy, verified data.

Data integrity and quality systems

DO NOT:

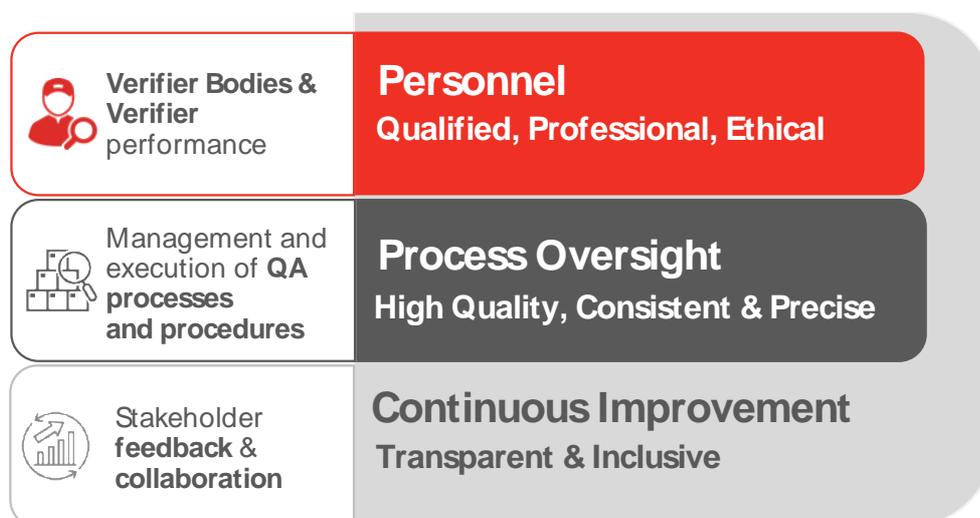
Focus on the correctness or accuracy of verified data.

1.2 SLCP's Quality Assurance Framework

SLCP's QA Framework consists of activities, protocol, and guidance that feed into three major areas:

Assuring qualified and trained PERSONNEL are carrying out SLCP processes and activities.
SLCP approves Verifier Bodies and their Verifiers to carry out SLCP activities. It is integral to the success and quality of SLCP that qualified, trained and competent personnel conduct SLCP activities.
Assuring quality, consistency, and precision of SLCP activities via PROCESS OVERSIGHT.
SLCP contracts a Verification Oversight Organization (VOO) to create and manage processes for Verifier Body and Verifier approval and maintenance and verification performance management.
Leveraging partnerships and feedback for CONTINUOUS IMPROVEMENT of SLCP quality.
SLCP has mechanisms for feedback to support the improvement of SLCP as well as leverages partnerships for collaboration and the betterment of SLCP.

The following diagram depicts the main quality assurance activities explained in detail in this Manual and associated with each major area:



Verifier Body (VB) and Verifier performance

- Verifier and Verifier Body qualification requirements
- Entrance exam and e-learning trainings for Verifiers
- QA Manual
- VB Terms of Use
- VB Requirements
- Qualification process and requalification
- VB Systems Check
- Non-APSCA VB Systems special Check

Process and procedures

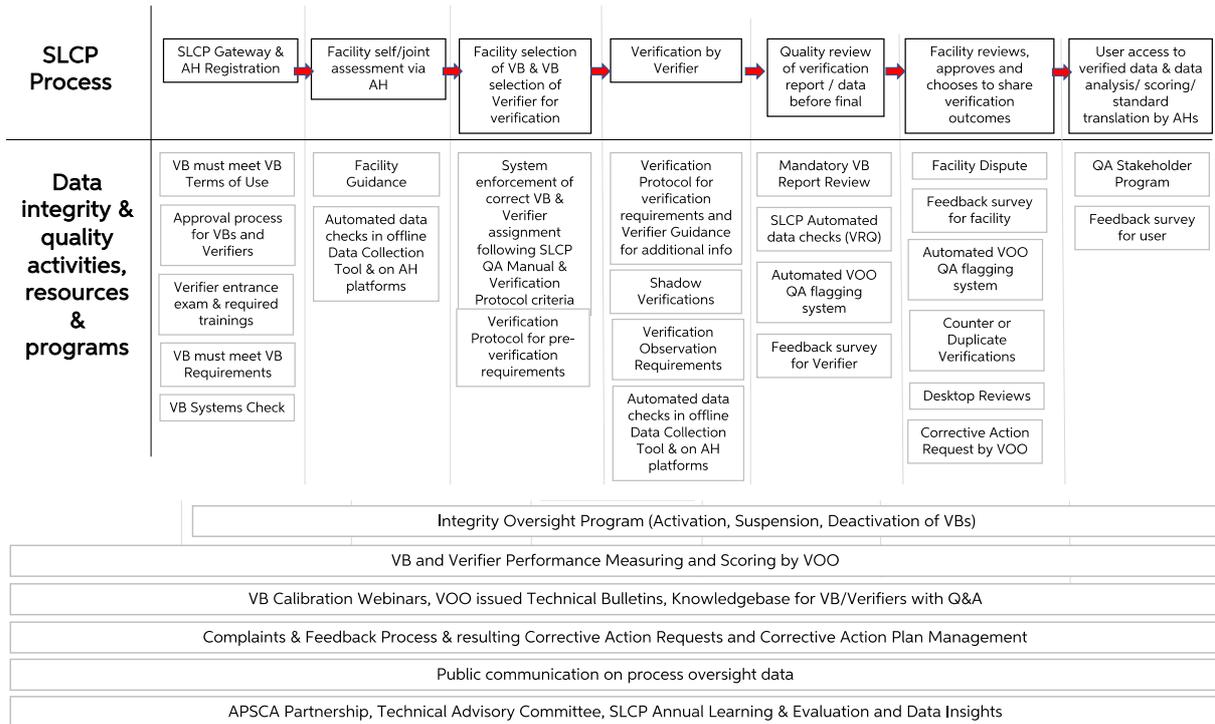
- VOO activities onsite (Shadow, Duplicate, Counter Verification)
- Desktop Reviews
- Automated Quality Check (VRQs)
- Automated VOO QA defect flagging system
- VOO Corrective Action Requests (CAR) and Corrective Action Plans Process for VBs
- VB scoring (informed by individual Verifier scores, CAR frequency, etc.)
- Quarterly Calibration Webinars
- Integrity Oversight Program
- Transparent Communication of oversight Data via public QA site
- Ongoing support to Verifiers/VBs with individual VB dashboard, Helpdesk, and online Q&A Knowledgebase.

Stakeholder feedback and collaboration

- Stakeholder QA program (brand and standard holder QA program)
- Feedback mechanisms (disputes during verification process, complaints, surveys)
- APSCA Collaboration Agreement
- Transparent Communication (public QA site)
- Verification Oversight Technical Advisory Committee
- Collaboration with other schemes (e.g., FTUSA, amfori)

1.3 QA System in Context of the CAF Assessment Process

Explaining SLCP QA through personnel, process oversight and continuous improvement is one way to understand our data integrity and quality management, but our QA activities and processes can also be explained by viewing them in context of the CAF Assessment Process. QA activities/ processes can be associated with every step of the Assessment Process, as visible in the following diagram.



2. Scope

This manual describes all procedures in place related to QA. For specific requirements on Verifier Bodies and Verifiers, other documents need to be considered, including the Converged Assessment Framework (CAF) which contains the Verification Protocol and Verifier Guidance, Verifier Body Requirements, and Verifier Body Terms of Use. Please see the [Helpdesk](#).

3. Establishing Qualified and Trained Personnel

3.1 VB and Verifier Status and Eligibility

The VOO on behalf of SLCP determines eligibility and status of all Verifiers and Verifier Bodies participating in SLCP. The VOO and SLCP hold the right to change the status of a Verifier or VB due to poor performance related to QA activities and failure to meet SLCP Requirements. Statuses are maintained by the VOO and implemented through the Gateway feature of activating or deactivating VBs and Verifiers. Approval statuses are shared publicly in the [SLCP Active Verifier Body \(VB\) List](#).

3.1.1 Status determination: There are two main operational categories: active or deactivated. Within each category there are approval statuses:

- 3.1.1.1 **Active status** is required to conduct SLCP activities, including performing verifications. VBs and Verifiers shall maintain an “active” status to conduct SLCP activities year over year. Approval statuses within the “active” category are Probation, Provisional, Full.
- **Probation:** VB that is currently undergoing additional remediation due to identified quality issues (linked to Integrity Oversight Program see section 3.2)
 - **Provisional:** Non-APSCA member that has been provisionally approved to complete verifications but has not yet completed the Reasonable VB Systems Check process (see section 3.5). Or a VB who is an APSCA Provisional Member Firm.
 - **Full:** VB is either 1) an APSCA full member or 2) non-APSCA member that has completed the Reasonable VB Systems Check from the VOO and has closed any significant gaps in quality systems.
- 3.1.1.2 **VBs and Verifiers marked as deactivated** in the Gateway are ineligible to perform any SLCP activities, including verifications. The approval statuses associated with the “deactivated” category are Suspended, Terminated, or Voluntarily Withdrawn.
- **Suspended:** The VOO holds the right to suspend any VB for failure to remediate when deactivated or at any time due to integrity, serious quality concerns, (repeat) breaches of requirements and procedures, or similar. Suspended VBs and Verifiers are ineligible to perform any SLCP activities for the defined suspension period.
 - **Terminated:** Permanent removal from SLCP without possible re-entry.
 - **Voluntarily Withdrawn:** Per the VB Terms of Use, a VB can decide to voluntarily relinquish their approval.

For more details about statuses, how to maintain status, and how to lift a “suspension” status, refer to the [Verifier Body Requirements](#).

3.2 Integrity Oversight Program

VB performance in SLCP and the performance of a VB's Verifier(s) affects a VB's status and eligibility to participate in SLCP. The SLCP Integrity Oversight Program, outlined in SLCP's Verifier Body Requirements, is a three-strike system to initiate probation and ultimately suspend low performing VBs and Verifiers that pose risk to SLCP and its users. Status changes of VB's are communicated publicly on the SLCP Active Verifier Body (VB) List.

3.3 General Verifier Body Application & Approval Process

The Verifier Body application process ensures Verifier Bodies have the skills, knowledge and experience required to manage SLCP Verifiers and facilitate the implementation of reliable SLCP verifications. For more details about the application process for Verifiers and VBs, please see [Appendix I](#).

3.3.1 Application process

- 3.3.1.1 Companies can apply to become an SLCP approved VB for a specific country using the VOO's [online application](#).
- 3.3.1.2 Candidate VBs shall sign the [VB Terms of Use](#) and provide information on their experience conducting social audits, policies and procedures on Verifier competency, policies and procedures on ethics, impartiality, conflict of interest, and anti-corruption.

3.3.2 Required criteria

- 3.3.2.1 The table below highlights the key criteria that candidate VBs shall meet.
- 3.3.2.2 Additional requirements and criteria are outlined in [SLCP's Verifier Body Requirements](#), including processes to maintain SLCP competence, conduct SLCP trainings, monitor Verifier SLCP performance, uphold ethics and integrity requirements, and more.

Criteria	Specifics
SLCP Signatory	All VB candidates must be an SLCP Signatory.
Organization type and experience	2 nd party or 3 rd party SLCP signatory with minimum 3 years' track record in auditing of social and labor conditions in textile, apparel, or footwear facilities
Geographical location	Experience with social and labor auditing in SLCP roll-out country/region
Internal Management System	Management system to ensure the competency of Verifiers, including policies and procedures on competence, training, ethics, integrity, impartiality, and internal quality assurance
Commitments	Candidates commit to meet all Verifier Body requirements and sign the applicable Terms of Use.
APSCA	APSCA membership is not required, but membership is highly encouraged, and APSCA Full Member companies are automatically accepted for approval.

3.3.3 VB approval process

Once a candidate VB submits its application online, the VOO reviews the applicant's information to approve or deny it. The VOO's decision is communicated to the candidate VB via email. Approved VBs are granted "active" status and upon approval of at least one Verifier are added to the [SLCP Active Verifier Body \(VB\) List](#). A new active VB will be able to register with an Active Accredited Host. VB statutes are differentiated into:

3.3.3.1 Provisional (Provisional SLCP Verifier Body)

3.3.3.2 Full (Full SLCP Verifier Body)

3.3.4 VB that is approved, either Provisional or Full: may put a candidate Verifier through the SLCP Verifier application process. See section 3.11.

3.3.5 APSCA Membership Approval Process: As a result of SLCP partnership with APSCA, a separate approval process is applied (see [Appendix II](#)):

3.3.6 APSCA Full Member Firms are granted Full SLCP Verifier Body status. APSCA Full Member Firms are still subject to a Limited VB Systems Check (see section 3.5) and are not charged a fee.

3.3.7 APSCA Provisional Member Firms are granted Provisional SLCP Verifier Body status.

3.3.7.1 Provisional APSCA Member Firms that gain APSCA Full Member Firm status within 6 months of being granted Provisional SLCP Verifier Body status are granted Full SLCP Verifier Body status.

3.3.7.2 Provisional SLCP Verifier Bodies in APSCA Provisional Member Firm status for more than 6 months after being granted Provisional SLCP Verifier Body status are subject to a Reasonable VB Systems Check (see section 3.5) including payment of fees.

3.3.8 Payment of fees: Non-APSCA Members and Provisional SLCP Verifier Bodies in APSCA Provisional Member Firms status for more than 6 months must pay a fee, complete a Reasonable VB Systems Check and close out any significant gaps.

SLCP will invoice the candidate VB (or Provisional SLCP VB) for a VB Systems Check fee as per the [fee schedule on the Helpdesk](#).

3.3.9 Non-payment of fee

3.3.9.1 Non-APSCA Member applicants' removal from SLCP VB application process

3.3.9.2 Provisional SLCP Verifier Bodies' no longer being associated with SLCP as a VB, i.e., removed from the Gateway and public list of Verifier Bodies maintained by SLCP

3.3.10 Invoice payments are net 30 days unless otherwise agreed upon.

3.3.11 Payment confirmed

3.3.11.1 Non-APSCA VB candidate is granted Provisional SLCP Verifier Body status

3.3.11.2 Provisional SLCP Verifier Body continues with Provisional SLCP Verifier Body status

3.3.12 Non-APSCA VB candidate (in status "Provisional SLCP VB" after confirmation of payment) or Provisional SLCP VB will be granted Full SLCP VB status after the Reasonable VB Systems Check is conducted and all significant gaps are closed within 90 days.

3.3.12.1 The VB Systems Check must occur within 6 months after payment of VB Systems Check fee; or

3.3.12.2 The VOO can proceed with a VB Systems Check once the non-APSCA VB candidate or Provisional SLCP Verifier Body completes one verified assessment report.

3.3.13 Non-APSCA VB candidate will be removed from the SLCP application process or Provisional SLCP VB will no longer be associated with SLCP as a VB if VB System Check is failed or significant gaps are not closed within 90 days.

3.4 VB Application Process to Expand SLCP Operations to Additional Countries

3.4.1 SLCP VBs are approved to carry out SLCP operations in specific countries. If an active VB would like to expand its SLCP operations to additional countries, the VB shall complete a separate supplemental application. The application processing for operations expansion to other countries follows the VB approval process 3.3.3.

3.4.2 If a VB subsidiary or regional office is responsible for their own verification operations and Verifier management, then each subsidiary or regional office will be considered a separate entity for the purposes of administration. For more details see [the Verifier \(Body\) Application Page](#).

3.5 Verifier Body Systems Check

VB Systems Checks review the policies and procedures VBs have in place to ensure the quality of SLCP verifications conducted by their Verifiers.

3.5.1 Selecting VBs for Systems Check

3.5.1.1 All Provisional VBs are subject to a “Reasonable” level check within 6 months of provisional approval.

3.5.1.2 A selected number of additional VBs will be assessed each year. Both 2nd and 3rd party VBs are assessed. VBs are selected jointly by the VOO and SLCP based on criteria including the number of verifications conducted, number of Verifiers participating in operations, and number of countries of operation.

3.5.2 Scope of Check: There are two levels of Checks

- **Reasonable:** The Reasonable Check is larger in scope than the Limited Check and may include activities such as background/due diligence check, check on company background, quality assurance, ethics and integrity, and interviews with administrators and Verifiers.
- **Limited:** The Limited Check still consists of interviews and documentation review to ensure SLCP requirements are met, but it follows a sampling approach of VB management systems.

3.5.3 The VOO assesses the following topics during a VB Systems Check:

3.5.3.1 VB’s policies and procedures on Verifier competence and performance monitoring.

3.5.3.2 VB’s policies and procedures on training for Verifiers.

3.5.3.3 VB’s policies and procedures on internal quality, including report review.

3.5.3.4 VB’s practices for calibrating Verifiers to ensure consistency, both within the VB and with external requirements.

3.5.3.5 VB’s practices for ensuring Verifiers act ethically.

3.5.3.6 VB’s policies and procedures on ethics, integrity, impartiality, and management of conflict of interest in carrying out verification activities.

3.5.4 Procedure

- 3.5.4.1 Assessments are generally conducted remotely, but the VOO reserves the right to visit operational offices at their discretion.
- 3.5.4.2 The VOO requests documentation from the VB and shall schedule teleconference meetings to review material with VB management.
- 3.5.4.3 Once the VOO requests documentation, VBs have 14 days to submit the requested documentation to the VOO.

3.5.5 Outcome(s) of Systems Check

- 3.5.5.1 The outcomes of VB System Checks are recorded in a standard report form.
- 3.5.5.2 The standard report is shared with the VB so they can take steps to address gaps in their SLCP programs.

3.5.6 Required Corrective Action

- 3.5.6.1 If the VOO finds significant gaps in the VB's SLCP Program, the VB will be required to take corrective action to address those gaps.
- 3.5.6.2 VBs that do not take corrective action are subject to suspension and ultimately termination. For more details about the corrective action process see SLCP's [Verifier Body Requirements](#).

3.6 VB Status Maintenance

- 3.6.1 All approved VBs are subject to review by the VOO.
- 3.6.2 **Regular VB System Checks** (see section 3.5) ensure that VBs uphold their commitments to developing and implementing policies and procedures on SLCP approved Verifier competence, training, ethics, integrity, impartiality, and internal quality management.
 - 3.6.2.1 All VBs shall be subject to a Check at least once every three years.
 - 3.6.2.2 VBs subject to the Reasonable Check based on the established criteria shall have a Reasonable Check initially and then a Limited Check at least once every three years.
 - 3.6.2.3 VBs exempt from the Reasonable Check based on the established criteria shall be subject to a Limited Check at least once every three years.
- 3.6.3 VBs may be selected for additional Checks based on risk assessment or issue reporting.
- 3.6.4 VBs eligible for a Limited Check may be assigned a Reasonable Check at the VOO discretion.

3.7 Verifier Body Requirements Document

SLCP outlines the requirements that SLCP Verifier Bodies shall meet to maintain their status as approved VBs. The Verifier Body Requirements applies to all SLCP approved VBs. VBs are responsible for reading and upholding the requirements set forth in the Verifier Body Requirements. See the [Verifier Body Requirements](#).

3.8 Verifier Body Terms of Use Document

To submit an application, the VB shall accept and sign the SLCP's Verifier Body Terms of Use. For current Terms of Use see the [Helpdesk](#).

3.9 Verifier Body Continued Training

3.9.1 VBs shall attend SLCP Verifier Body Calibration webinars provided by the VOO. The content in these webinars shall be made available to VB's Verifiers and other staff.

3.9.2 Attendance or viewing of calibration webinars can be used for continuous Verifier training. For more details about Calibration Webinars see [Verifier Body Requirements](#).

3.10 Verifier Body Scoring

The VB score is a cumulative score calculated using a VB's Verifier(s) score(s), the VB Systems Check score, and the ratio of Corrective Action Requests and other factors determined by SLCP and the VOO at their discretion. VBs are scored from 0 to 5 with 5 as the highest attainable score. VBs are assigned a risk rating based on their VB score, and this risk rating is monitored as part of the Integrity Oversight Program (see 3.2).

3.10.1 Communication: The VOO provides each VB with a private dashboard summarizing performance data including:

3.10.1.1 VB's individual Verifier scores (including, for comparison, the average score taking all SLCP Verifiers into account)

3.10.1.2 Messages and bulletins summarizing areas of potential improvement

3.10.1.3 Results of VB Systems Check and other quality assurance activities (e.g., Counter Verification, complaint/ feedback investigation)

3.10.2 SLCP public QA dashboard: SLCP publicly shares aggregate VB and Verifier scoring information (e.g., current average VB score) and other metrics on SLCP's data integrity and program. See [SLCP's Public Site on QA Metrics](#).

3.11 General Verifier Application & Approval Process

The Verifier application process ensures that Verifiers have the skills, knowledge and experience required to conduct consistent and reliable SLCP verifications. Employees of VBs with an "active" SLCP status may apply to become an approved Verifier. Part-time or subcontracted Verifiers may also apply to become an approved Verifier only if the Verifier works on a subcontracted/part-time basis exclusively for one active VB for the purpose of SLCP verifications.

3.11.1 Application process: Approved VBs will receive a link to pass on to individual candidate Verifiers. Candidate Verifiers shall follow the link provided by the VB to submit their application to the VOO. For more details on the application process for Verifiers and VBs see [Appendix I](#).

3.11.2 SLCP Verifier criteria: The table below summarizes the general requirements that candidate Verifiers shall meet:

Criteria	Specifics
Employment contract with an approved VB	Employee of a Verifier Body with “active” SLCP status – or – Part-time or subcontracted individual who works on a subcontracted/part-time basis exclusively for one active VB for the purpose of SLCP verifications
Work experience	Minimum of 3 years of conducting social and labor type of onsite audits/verifications, with robust proof of relevant experience (e.g., number of audit days etc.)
Education/ qualification	Post-Secondary Degree / Diploma
	<p>Required:</p> <p>Independent* lead auditor training on at least one generally recognized social auditing system, e.g., SA8000, BSCI, WRAP, RBA or IETP</p> <p>Recommended:</p> <ul style="list-style-type: none"> > Lead Auditor training on at least one management systems auditing standard: ISO 9001, ISO 14001, OHSAS 18001/ISO 45001 > Experience conducting management systems audits > APSCA membership at RA or CSCA level > Other relevant social scheme Auditor (e.g., Lead) approval / accreditation > Company internal social auditor trainings <p><i>*Independent generally means provided by external entity with no conflict of interest (i.e., no business interest in the outcome)</i></p>
Geographical location	Experience with social and labor auditing in country/region being applied for
Knowledge areas	Thorough understanding of social and labor type of onsite verification processes, including project planning, communication, ethics
	Proficiency in English and local language(s) in roll out country**
	<i>**Preferred but not required. If candidate has sufficient experience with social and labor auditing in country/region, translators are permitted. The VOO has discretion to determine if experience is sufficient to allow for this approval.</i>
	Knowledge of international and local norms, and national laws and regulations to social and labor issues, e.g., local labor laws, UN, and ILO conventions
	Knowledge of core management system requirements
APSCA	APSCA membership is not required, but membership is highly encouraged. Certified Social Compliance Auditors (CSCA) are automatically accepted for general approval.

3.11.3 Onsite social auditing experience is defined as experience at facilities assessing social and labor conditions. This experience can include conducting 2nd and 3rd party audits as well as internal auditing experience. For example, conducting internal social audits as a compliance officer at a facility can count toward this qualification.

For the purposes of the SLCP Verifier criteria, internal auditing can be included in the 3-year minimum if the following criteria are met:

3.11.3.1 Internal auditing experience shall be directly related to social/labor

compliance where the scope includes hiring practices, working conditions, fair wages, health and safety, management systems (experience in other compliance such as CTPAT is not relevant).

3.11.3.2 The 3 years is not wholly based on internal auditing (i.e., at least some of the experience shall include external auditing/verifications).

3.11.3.3 The overall education and experience of the candidate indicates knowledge of social auditing systems and methods.

3.11.4 Verifier required training

3.11.4.1 Candidate Verifiers put forward by an active VB and meet SLCP criteria are eligible to take SLCP's required training.

3.11.4.2 Training consists of seven online modules and any other training the VOO designates as mandatory. Mandatory training is provided in English.

3.11.4.3 The Verifier may take SLCP trainings in a language other than English, but it will be voluntary and not count as fulfilling the requirement.

3.11.5 Verifier required entrance exam

3.11.5.1 After completing SLCP's required training, candidate Verifiers shall take and pass an online proctored exam.

3.11.5.2 Verifiers are permitted two initial exam attempts.

- A candidate shall wait 30 days between first and second exam attempt.
- Verifiers who fail the second attempt must wait 12 months and then may re-apply as a candidate.

3.11.5.3 If reapplication is approved, the candidate is given one additional attempt.

3.11.5.4 Each failing of an extra attempt will result in an additional 12-month period to re-apply.

3.11.6 Verifier approval by VOO

3.11.6.1 Candidate Verifiers who have completed all SLCP training modules and passed the entrance exam are eligible for Verifier approval by the VOO.

3.11.6.2 Once candidate Verifiers passed the exam, they will receive a certificate and be approved by the VOO to conduct SLCP verifications.

3.11.6.3 The VB can register the new active Verifier with an Active Accredited Host, enabling the Verifier to conduct verifications.

3.11.7 Transfer of approval: Status as an SLCP approved Verifier is transferrable only between approved "active" VBs.

3.11.8 Information on active Verifiers: Due to privacy restrictions, explicit Verifiers are not publicly listed with their SLCP status. The SLCP Active Verifier Body (VB) List however has information on the number of active Verifiers by VB and by country with indication of whether the Verifier is located in the country (local) or not.

3.12 Verifier Eligibility Equivalence Review

If a Verifier candidate is initially determined to be ineligible but believes their combination of education, experience, and training meets the intent of the SLCP criteria, the Verifier can request Equivalency Review of their Verifier application.

- 3.12.1 Candidates have up to 30 days after the initial decision to request a review by submitting a completed 'Eligibility Equivalence Review Request Form'.
- 3.12.2 Request forms are reviewed by an expert panel. The purpose of the panel is to review the overall qualifications of the individual to make a professional judgement regarding the applicant's ability to meet SLCP's criteria. The SLCP panel consists of:
 - One VOO member
 - One SLCP Secretariat member
 - One expert member (typically from an organization that deals with social auditing competency, such as APSCA)
- 3.12.3 Each panel member votes whether to 'Approve' or 'Not Approve'. A simple majority indicates the final result.
- 3.12.4 Requests are reviewed by a panel within approximately 1-2 weeks from form submission, however, may take longer due to other commitments of the panel members. 'Equivalence/exceptions' are granted on a case-by-case basis. If equivalence is approved, the eligibility finding is changed in the original application and the candidate is notified via email.
- 3.12.5 If the qualifications of a candidate change (e.g., additional training or experience), they may reapply in full following the application process as per section 3.11.

3.13 Verifier SLCP Status Maintenance Program

- 3.13.1 Verifier Status Maintenance Program: All approved Verifiers shall act annually to maintain their "active" status via the Verifier Status Maintenance Program.
- 3.13.2 Approved Verifiers will be required to participate in a status maintenance program that will consist of providing proof of continued activity in the industry, continuing education, and any additionally required training at a specific interval and/or any other actions as deemed fit by SLCP.

For more details see the [Verifier Body Requirements](#).

3.14 Verifier Performance Scoring

The VOO monitors Verifier performance and scores Verifier performance based on data collated from SLCP QA activities. Verifier Performance scoring is a tool to communicate Verifier performance, highlight opportunities for improvement and identify low performing Verifiers.

- 3.14.1 **Scoring inputs:** The VOO utilizes multiple sources of data to calculate scoring. The following are considered:
- 3.14.2 **Verifier Exam Scores** as the preliminary score in the absence of QA data (see section 3.11). Once QA data is available, the exam score will be excluded from overall Verifier scoring.
- 3.14.3 Technology Enabled Data Checks (see section 4.1)

- 3.14.4 Desktop Review Outcomes (see section 4.2)
- 3.14.5 Counter Verification Outcomes (see section 4.3)
- 3.14.6 Duplicate Verification Outcomes (see section 4.4)
- 3.14.7 Shadow Verification Outcomes (see section 4.5)
- 3.14.8 Facility or User Feedback Outcomes (see section 5.1)
- 3.14.9 Complaints and Disputes (see sections 5.2 and 5.3)
- 3.14.10 **Scoring methodology:** SLCP has a pre-determined, formulated scoring system that weights inputs based on importance.
- 3.14.11 **Scoring process:** The inputs for various QA activities and data related to individual verifications are scored, averaged, and aggregated into a single numeric Verifier score between 0 to 5 with 5 as the highest attainable score. Data on scores is stored in the VOO database.
- 3.14.12 **Scoring communication:** Verifier Scoring is made available to VBs on their online SLCP dashboard. Average active Verifier score information is also visible on the VB's private dashboard as well as on the public SLCP QA Metrics site.

3.15 VB and Verifier Supporting Documents

SLCP publishes normative documents for Verifiers and Verifier Bodies to effectively carry out SLCP activities. These documents outline required procedures and guidance that support the consistent implementation of SLCP in accordance with SLCP requirements. Verifiers and Verifier Bodies are held accountable for assuring SLCP activities are conducted in alignment with the outlined procedures.

- 3.15.1 **Verifier Guidance:** provides Verifiers with instructions on how to complete the SLCP verified assessment report.
- 3.15.2 **Verification Protocol:** provides VBs and Verifiers with important information about verification procedures and requirements.

3.16 VB and Verifier Ongoing Engagement and Support

SLCP and the VOO manage multiple support resources to improve VB and Verifier competency and quality. These resources are updated regularly to reflect up-to-date content related to SLCP.

- 3.16.1 **VB dashboard:** The VOO maintains a VB online dashboard for each SLCP approved VB. The dashboard contains real-time information specific to the individual VB, including Verifier performance, VB scoring information and Corrective Action Requests.
- 3.16.2 **Online Helpdesk:** There is a specific section for Verifiers and Verifier Bodies on the Helpdesk. Further, Verifiers and VB admins can submit support tickets on the Helpdesk to receive timely support. Requests related to verification are automatically forwarded to the VOO. Questions and concerns raised through tickets are tracked to improve the Helpdesk FAQs and/or share technical information with VBs and Verifiers through technical bulletins and/or VB Calibration Webinars.
- 3.16.3 **Online Q&A Knowledgebase:** Detailed Q&A from VB Calibration Webinars is documented and shared on the Helpdesk.

- 3.16.4 Technical Bulletins:** Ongoing/ ad-hoc notifications sent to VBs via email by the VOO and also posted on VBs' dashboards (see 3.17.1). Notifications include important reminders or verification quality related information that must be shared immediately and cannot wait till the quarterly Calibration Webinar.
- 3.16.5 VB Calibration Webinars:** Quarterly engagement by SLCP and the VOO to share important updates, calibrate all VBs on specific requirements and allow for Q&A. Calibration Webinars shall be attended by a VB representative and content of the webinars can be used for continuous Verifier training.
- 3.16.6 Direct engagement with the VOO:** Anyone can contact the VOO via slcp@sumerra.com for verification process related support.

4. Process Oversight

4.1 Automated, Tech-Enabled Process Oversight

SLCP and the VOO leverage technology to drive quality throughout SLCP's processes.

- 4.1.1 Gateway check on assignment of VB and Verifier:** There are system checks integrated into the ITC Gateway to ensure that verifications are assigned to Verifiers and Verifier Bodies meeting SLCP criteria, and to share information with Verifier Bodies to facilitate correct implementation of the SLCP Verification Protocol.
- 4.1.2 Correct Tool completion checks:** The Data Collection Tool is a major component of SLCP's Converged Assessment Framework (CAF). Facilities and Verifiers fill in the Tool offline and/or online on the AH platform to complete a verified assessment report. There are data quality checks integrated into the offline Tool and online AH platform to reduce human error and ensure data quality.
- 4.1.3 SLCP automated data quality checks (SLCP assessment in VRQ status):**
 - 4.1.3.1** SLCP runs an automated data quality check on each verified assessment once the Verifier has completed the report via the AH platform and is ready for facility review.
 - 4.1.3.2** If the data quality check fails, the Verifier is notified of the specific failure(s) and is given the opportunity to make corrections before the facility is notified of the completed report. The failure may also be technology related, and in those instances the applicable AH is informed.
 - 4.1.3.3** The VOO receives the automated data quality check results prior to report finalization and also once the report is finalized. This gives the VOO insight on whether the Verifier made corrections and improved the quality of the report as well as if the quality review process of the VB is effective or not.

For more details see the [Helpdesk](#).

- 4.1.4 Automated VOO QA flagging system:**
 - 4.1.4.1** The VOO utilizes technology to identify failures related to implementation of SLCP verification procedure and verified assessment report content.
 - 4.1.4.2 Examples of flags** include Verifier language requirement not being met; minimum time spent on verification does not meet requirements; the report's accuracy index is over the norm; no report content difference between before report

finalization and after report finalization if the automated data quality check (see 4.1.3) failed.

4.1.4.3 Flags are reviewed by the VOO and SLCP on an on-going basis (e.g., as a result of repeat feedback/ complaints; new procedure/ requirement put into place that needs enforcement) and updated as needed.

4.1.4.4 **Required Corrective Actions**

- Depending on the results of the VOO QA flagging, the VOO can issue Corrective Action Request(s) that go to the VB program administrator for SLCP, if the gaps are not addressed by the Verifier.
- Verifier performance scoring and ultimately VB scoring is affected by the issued Corrective Action Requests. For more details see section 4.6.

4.2 Desktop Reviews of Verified Assessment Reports

Desktop Reviews are remote assessments of verified assessment reports conducted by the VOO. They are conducted to assess the quality, precision, and consistency of verifications across SLCP operations.

4.2.1 Verified assessment report selection

4.2.1.1 **Reports are selected based on risk** through stratified random sampling and simple random sampling.

4.2.1.2 Approximately one-third of Desktop Reviews will be selected using stratified random sampling, one-third selected based on risk factors, and one-third using simple random sampling. SLCP and the VOO reserve the right to adjust these ratios as necessary.

4.2.1.3 **Risk factors:** There are multiple risk factors for selecting reports. The QA flags in section 4.1.4 are considered along with other risk factors like Verifier exam score, newly admitted VB status, and others. Reports that meet identified risk factors are flagged for the VOO to review. Depending on how many reports are flagged, not every flagged report may be reviewed. If the number of flagged reports exceed sampling goals, flagged reports will be selected using stratified sampling of VBs and countries.

4.2.1.4 **Process:** Reports are generally selected for Desktop Review within 10 business days of the report's initial submission via the AH platform. Some reports are selected after longer timeframe based on additional quality information or reports.

4.2.2 **Verified assessment report review:** The VOO reviews the verified assessment. The review assesses quality and identifies inaccuracies and errors in the report. The VOO may contact the Verifier for clarifications, if needed.

4.2.3 **VOO Desktop Review report:** The VOO records Desktop Review outcomes in a standard report format. Desktop Review reports are completed within 10 business days of selection of the report review. Individual Desktop Review reports are not provided to VBs.

4.2.4 **Follow up communication to VBs:** The VOO may follow up directly with individual VBs if Desktop Review shows their Verifiers do not understand the Verification Protocol and the VB needs to take specific action to improve their reports by submitting a Corrective Action Request.

4.2.5 **Potential Outcomes:** Desktop Report Reviews can have a variety of outcomes.

4.2.6 **Required Verifier corrections to a report:** In exceptional circumstances, the

VOO can require a Verifier to make corrections to a report. This includes when there are technical issues or if a report has been uploaded accidentally before the verified assessment report is complete.

- 4.2.7 Process to change a report:** The VOO will change the status of a report from VRF to VRE on the Gateway. Before setting the status of the report to VRE, the VOO also checks if the facility has any other assessments in progress on the AH (ASI, ASC, VRP, VRC, VRE, VRD). If there are assessments in progress, the VOO shall first contact the facility to ensure the correct assessment is being modified and put back into the system before setting the status to VRE, as only one active assessment is permitted on the AH platform. Within 5 calendar days, the Verifier shall make corrections and the facility shall review the report before the report status is automatically set back to VRF.
- 4.2.8 Bribery investigation:** If the VOO's Desktop Review indicates that the Verifier or facility may have solicited or accepted a bribe, or otherwise behaved unethically, the VOO follows the procedure to investigate bribery and unethical behavior outlined in section 6.
- 4.2.9 Invalidate a verified assessment report:** In rare cases, Desktop Reviews can require the invalidation of an assessment report. For more details see section 7.
- 4.2.10 Impacts to Verifier scoring:** Quality defects related to Verifier performance (e.g., not following Verification Protocol requirements) shall impact Verifier scoring and ultimately VB scoring. For more details see 3.15.
- 4.2.11 Reporting errors and inaccuracies for SLCP improvement:** The VOO assesses questions that have not been verified properly; instances where the Verification Protocol was not followed; and technology issues with the Tool and/or AH platforms. The VOO aggregates information on common mistakes and misunderstandings and includes this in the quarterly Calibration Webinar and may post it on the VB's dashboard bulletin board (see 3.17.1) so they are informed of common mistakes and critical issues. This data is also used to generally inform the improvement of SLCP, including the CAF, Verifier training, and Helpdesk information. Real-time summary of issues identified through Desktop Reviews is available on the public [SLCP QA Metrics](#) site.

4.3 Counter Verifications

Counter Verifications are high level 1-day visits to a facility that recently completed a verification. They are used to assess if SLCP verification procedures are being followed, if Verifiers have the skills and knowledge to conduct verifications, and if verified assessment report content is generally accurate.

Counter Verifications employ the same methods of verifying information used in verifications (worker interviews, document reviews, etc.) as well as discrete interviews with management to gather information about the initial verification. The accuracy and reliability of verified data is assessed by comparing the initial verification outcomes to the Counter Verification outcomes. The VOO aims to complete all Counter Verifications with VOO employees, but due to geographical reach and experience, the VOO may employ SLCP Verifiers as Counter Verifiers.

- 4.3.1 Counter Verifier eligibility:** SLCP Verifiers with an "active" SLCP status and meeting specific criteria or VOO employees shall complete the required training to be considered eligible to become a Counter Verifier. Counter Verifiers shall be employees of a VB or representatives of the VOO.
- 4.3.2 Experience:** Counter Verifiers shall have a minimum of 2 years' experience conducting quality assurance such as report reviews or internal audits.
- 4.3.3 Required training:** Candidate Counter Verifiers shall complete the VOO's

Counter Verification training. Contact the VOO via slcp@sumerra.com for details on Counter Verification Training.

- 4.3.4 Assigning a Counter Verifier:** The VOO determines the Counter Verifier for every Counter Verification performed based on factors including availability, experience, and cost. Counter Verifiers that performed the initial SLCP Verification at a facility are not eligible to perform the Counter Verification at the same facility. Counter Verifiers that belong to the VB who completed the initial SLCP Verification at a facility are not eligible to perform the Counter Verification at the same facility.
- 4.3.5 Conflicts of Interest:** To avoid conflicts of interest and ensure integrity when Counter Verifications are performed by VBs, the VOO takes the following measures:
- 4.3.5.1 Reviewing each Counter Verification to confirm that the Counter Verifier assessed the facility objectively
 - 4.3.5.2 The name of the VB who performed the initial verification is not provided and is removed from reports and preparation materials
 - 4.3.5.3 Any determinations about Verifier performance during the initial verification are made by the VOO not the VB
 - 4.3.5.4 Ensuring and communicating that all VBs are subject to Counter Verifications and other onsite QA activity
 - 4.3.5.5 If the Counter Verification indicates poor Verifier performance, this is cross checked with additional QA activities
- 4.3.6 Counter Verification facility selection:** All facilities where verifications have taken place are subject to Counter Verification. Selection of facilities for Counter Verification is done by the VOO. Facilities are chosen based on several criteria including risk factors, size, facility type and geographic location. Risk factors include (but are not limited to) indications of corruption, usual accuracy rate, suspected or known Verifier performance issues, verifications associated with disputes or complaints, or other risk factors determined by the VOO.
- 4.3.7 Counter Verification coordination:** The VOO contacts facilities to inform them of the Counter Verification. Counter Verifications are announced. The VOO works with the facility and Counter Verifier to find a suitable date for the Counter Verification. There are no costs to facilities for Counter Verifications.
- 4.3.8 Counter Verification preparation:** Prior to the Counter Verification, the Counter Verifier reviews the verified assessment report, Verifier information, and if available the VB Systems Check outcome and/or information from the dispute and/or complaint. This allows the Counter Verifier to review any inconsistencies and determine which questions to sample while on site.
- 4.3.9** If the Counter Verification is conducted by a VB, the VOO makes this information available to the VB/Counter Verifier at least two weeks prior to the Counter Verification. A Counter Verification agenda is sent to the facility at least one week prior to the Counter Verification.
- 4.3.10 Counter Verification scope:** Counter Verifications assess the SLCP verification process; determine if Verification Protocol was followed in the initial verification; and measure Verifier performance. Counter Verifications are not used to correct or adjust the outcomes of the initial verification. In extreme cases, Counter Verifications can result in the invalidation of the initial verification.

- 4.3.11 Counter Verification process:** Counter Verifications take up to one working day and consist of three main activities: management interviews, data verification, and cross comparison analyses.
- 4.3.12 Management interviews:** Interviews are conducted to assess the initial Verifier’s conduct and the verification procedure of the initial verification. Counter Verifiers should spend no more than 1 hour conducting management interviews to assess Verifier conduct and verification procedures. There are two types of management interviews conducted during Counter Verifications, each serving a different purpose.
- 4.3.12.1 Counter Verifiers conduct management interviews to assess Verifier conduct and verification procedure during the initial verification. This is an activity that is unique to Counter Verifications and the purpose of this activity is to get input from facility management on the SLCP process. Counter Verifiers use a pre-defined set of questions to guide management interviews. Questions are formulated to cross-check information coming from other QA activities and to gather additional information.
- 4.3.12.2 Counter Verifiers conduct management interviews to assess the accuracy of the initial verification report content. This activity assesses the facility responses and corrected responses to questions in the SLCP tool and follow the same procedure required during the initial verification.
- 4.3.13 Onsite data verification:** Counter Verifiers review assessment questions, facility responses and verification data. Counter Verifiers use the same verification methodologies used during the initial verification and shall follow SLCP’s Verification Protocol to assess if information contained in the initial verified assessment report is generally accurate. Counter Verifications note and analyze any differences between what was reported and what is observed on site during the Counter Verification. These observations are marked as “observed on site.”
- 4.3.14 Onsite sample comparison of Counter Verification findings with initial verification data:** Counter Verifiers compare a subset of the initial verification responses with the Counter Verification findings. The purpose of this sample comparison is to immediately assess if there are significant differences in data. If a significant difference is noted, the Counter Verifier will start an investigation into the initial Verifier’s quality and conduct (including an investigation into bribery). The questions WH-WOR-11; WB-WAG-5; HS-RIS-1; WT-FOR-12 and FWI-FOA-2 will be assessed during each Counter Verification, to give points of comparison.
- 4.3.15 Pre-determining comparison sample:** Prior to the Counter Verification, the Counter Verifier selects a sample of 2-3 SLCP verification questions to be compared. Depending on actual conditions on site, such as suspected corruption, the sample questions to be assessed may be changed during the Counter Verification. The sample should include questions where the response was corrected and questions where the response was not corrected.
- 4.3.16 Suspected corruption:** For Counter Verifications taking place at facilities where corruption is suspected, Counter Verifiers will pre-select questions that are relevant to the issue being investigated. Counter Verifiers should be aware of areas where corruption (e.g., falsified records) is likely to be uncovered and focus on these questions.
- 4.3.17 Comparison analysis:** Counter Verifiers will spend a portion of the Counter Verification investigating underlying reasons for the differences between what is contained in the verified assessment report and what is observed on site. To do this analysis, Counter Verifiers may conduct additional document review, worker interviews and/or management interviews. If a Counter Verifier observes any differences between what was reported during the initial verification and the Counter Verification, they investigate fully to

determine if the discrepancy is due to corruption or falsification of records. Counter Verifiers will capture as much information as possible on the underlying reasons for the discrepancies in the Counter Verification report.

- 4.3.18 Counter Verification findings and report:** Counter Verifiers are responsible for analyzing and capturing verified data differences. Counter Verifiers employed by VBs submit their findings in a preliminary Counter Verification report to the VOO using a standard report template provided by the VOO. Preliminary Counter Verification reports are due to the VOO within 5 business days of the Counter Verification.
- 4.3.19 VOO Counter Verification report review:** The VOO analyzes any differences between the initial verification and the Counter Verification and categorizes the differences/discrepancies. The VOO determines if the discrepancies were due to understandable point in time differences, systemic oversight, Verifier skill and competency and/or other issues. The VOO may follow up with VB Counter Verifiers if additional clarifications are necessary.
- 4.3.20 Potential Outcomes:** Counter Verifications can have a variety of outcomes.
- 4.3.21 Bribery investigation:** If the Counter Verification indicates that the Verifier or facility may have solicited or accepted a bribe, or otherwise behaved unethically, the VOO follows the procedure to investigate bribery and unethical behavior outlined in section 6.
- 4.3.22 Invalidate a verified assessment report:** In rare cases, Counter Verifications can require the invalidation of an assessment report. For more details see section 7.
- 4.3.23 Impacts to Verifier scoring:** Quality defects related to Verifier performance (e.g., not following Verification Protocol requirements) shall impact Verifier scoring and ultimately VB scoring. For more details see 3.15.
- 4.3.24 Public reporting of outcomes:** The VOO aggregates information on Counter Verification outcomes on the public SLCP QA Metrics site. Any common mistakes and misunderstandings shall also inform the improvement of SLCP, including the CAF, Verifier training, Calibration Webinars and Helpdesk information.

4.4 Duplicate Verifications

Duplicate Verifications are an announced repeat of a verification, generally conducted within 2 months of the initial verification (there may be cases where this is extended) by a different VB or the VOO. Duplicate Verifications assess the initial Verifier's implementation of the Verification Protocol, the initial Verifier's competency, and the rigor of the initial verified assessment.

When inconsistencies in data are found between the initial and Duplicate Verification, the VOO investigates further to assess whether it is a competency issue (e.g., individual Verifier's knowledge and skills, training provided to the Verifier), or a procedural issue (e.g., Verification Protocol clarity, VB management procedures), or an ethical issue (e.g., bribery, corruption).

- 4.4.1 Duplicate Verifier eligibility:** SLCP Verifiers with an "active" SLCP status or representatives of the VOO.
- 4.4.2 Assigning a Duplicate Verifier:** VBs are selected based on availability, experience, cost, etc. If a VB is selected, the VB is responsible for assigning one of their employed, "active" status Verifiers to perform the Duplicate Verification.
- 4.4.3 Duplicate Verification facility selection:** All facilities that have hosted a verification are subject to a Duplicate Verification. The VOO selects facilities for Duplicate

Verifications considering risk factors, size, facility type and geographic location. Risk factors include (but are not limited to) indications of corruption, usual accuracy rate, suspected or known Verifier performance issues, verifications associated with disputes or complaints, or other risk factors determined by the VOO.

- 4.4.4 Duplicate Verification coordination:** The VOO contacts facilities to inform them of the Duplicate Verification. Duplicate Verifications are announced. The VOO works with the facility and Duplicate Verifier to find a suitable date for the Duplicate Verification. There are no costs to facilities for Duplicate Verifications.
- 4.4.5 Duplicate Verification preparation:** Preparation for Duplicate Verification is the same as standard verification.
- 4.4.6 Duplicate Verification scope:** Duplicate Verifications consist of the same activities as a standard verification.
- 4.4.7 Duplicate Verification findings and report:** The Duplicate Verifier submits an initial Duplicate Verification report to the VOO within 5 business days, using a standard verification report template provided by the VOO.
- 4.4.8 VOO Duplicate Verification report review:** The VOO analyzes differences between the initial verification and the Duplicate Verification and categorizes the differences/discrepancies. The VOO determines if the discrepancies were due to understandable point in time differences, systemic oversight, Verifier skill and competency and/or other issues. The VOO may follow up with Duplicate Verifiers if additional clarifications are necessary.
- 4.4.9 Summary for facilities:** Facilities receive a summary of the Duplicate Verification that includes details on the Duplicate Verification (when it took place, the party that conducted it, etc.) as well as a summary of any legal issues identified during the Duplicate Verification not identified during the initial verification. This includes a confirmation that the Duplicate Verification did not show any significant issues if none were found.
- 4.4.10 Potential Outcomes:** Duplicate Verifications can have a variety of outcomes.
 - 4.4.10.1 Bribery investigation:** If the Duplicate Verification indicates that the Verifier or facility may have solicited or accepted a bribe, or otherwise behaved unethically, the VOO follows the procedure to investigate bribery and unethical behavior outlined in section 6.
 - 4.4.10.2 Invalidate a verified assessment report:** In rare cases, Duplicate Verifications can require the invalidation of an assessment report. For more details see section 7.
 - 4.4.10.3 Impacts to Verifier scoring:** Quality defects related to Verifier performance (e.g., not following Verification Protocol requirements) shall impact Verifier scoring and ultimately VB scoring. For more details see 3.15.
- 4.4.11 Public reporting of outcomes:** The VOO aggregates information on Duplicate Verification outcomes on the public SLCP QA Metrics site. Any common mistakes and misunderstandings shall also inform the improvement of SLCP, including the CAF, Verifier training, Calibration Webinars and Helpdesk information.

4.5 Shadow Verifications

Shadow Verifications are a VOO observation of a verification to assess Verifier performance. During a Shadow Verification, the VOO observes the Verifier to assess Verifier competency and implementation of the

Verification Protocol.¹

- 4.5.1 Verification selection for Shadow Verifications:** The VOO selects verifications for shadowing randomly as well as based on risk. Risk factors include known issues with Verifier performance, known issues with VB performance, facilities that are involved in a complaint and suspected issues of bribery and corruption.
- 4.5.2 Shadow Verification coordination:** The VOO will notify a VB of a Shadow Verification by email. VBs shall provide the VOO with information on scheduling of verifications when requested. Shadow Verifications are announced to both the VB and the facility.
- 4.5.3 Scope of Shadow Verifications:** Shadow Verifiers do not actively participate in verifications but are observers of the verification conducted by the Verifier. The Shadow Verifier does not gather information, review the facility's self-assessment, or provide guidance to the Verifier. The Shadow Verifier may periodically ask the Verifier questions for clarification, but this should not interfere with the verification process.
- 4.5.4 Shadow Verification process:** Verifications with Shadow Verifiers shall be conducted as per the normal Verification Protocol. Shadow Verifiers follow and observe Verifiers throughout the verification process to observe behavior and conduct.
 - 4.5.4.1 Opening meeting:** During the opening meeting of the verification, the Shadow Verifier introduces themselves and explains the purpose of the Shadow Verification.
 - 4.5.4.2 Implementation of the Protocol:** The Shadow Verifier observes the verification process and notes instances where the Verification Protocol is not followed or other SLCP requirements are not met by the Verifier. The Shadow Verifier also notes any best practices.
 - 4.5.4.3 Verifier competency:** Verifiers are assessed on how well they follow SLCP procedures; their understanding of the SLCP system; professionalism; verification preparation; time management; reporting; knowledge of local laws and regulations; and knowledge of social, labor, and human rights issues.
- 4.5.5 Review of verified assessment report:** The Shadow Verification includes a review of the finalized verified assessment report to assess how accurately the report reflects the onsite verification.
- 4.5.6 Shadow Verification report:** Shadow Verifiers record outcomes in a standard report format submitted within 10 business days of the initial verified assessment report's finalization. The VOO shares the shadow verification report with the VB employing the Verifier if there are any reportable issues.
- 4.5.7 Potential Outcomes:** Shadow Verifications can have a variety of outcomes.
 - 4.5.7.1 Bribery investigation:** If the Shadow Verification indicates that the Verifier or facility may have solicited or accepted a bribe, or otherwise behaved unethically, the VOO follows the procedure to investigate bribery and unethical behavior outlined in section 6.
 - 4.5.7.2 Invalidate a verified assessment report:** In rare cases, Shadow Verifications can require the invalidation of an assessment report. For more details see section 7.
 - 4.5.7.3 Impacts to Verifier scoring:** Quality defects related to Verifier performance (e.g.,

¹ Shadow Verifications can also be conducted by entities other than the VOO, but these activities are not included in the official Shadow Verifications conducted on behalf of the VOO. See [QA Stakeholder Program](#) for more information.

not following Verification Protocol requirements) shall impact Verifier scoring and ultimately VB scoring. For more details see 3.15.

- 4.5.8 Public reporting of outcomes:** The VOO aggregates information on Shadow Verification outcomes on the public [SLCP QA Metrics](#) site. Any common mistakes and misunderstandings shall also inform the improvement of SLCP, including the CAF, Verifier training, Calibration Webinars and Helpdesk information.

4.6 VB Corrective Action Requests and Corrective Action Plans

Corrective Action Requests (CAR) are issued by the VOO to VBs if the VOO identifies VB quality and integrity issues that require action. Examples of issues can be poor results on onsite and desktop QA activity, complaints and feedback, failure to meet the Verifier Body Requirements, or designation of Level 2 or 3 risk as per the Integrity Oversight Program. Failure to fulfill CARs can result in suspension and ultimately the deactivation or suspension of a VB's status. For more details on Corrective Action Requests see SLCP's [Verifier Body Requirements](#).

4.7 Observation of Verifications by Interested Stakeholders

If an interested stakeholder that is not representative of a Verifier Body (e.g., brand, non-governmental organization, etc.) wishes to observe/shadow a scheduled verification, they need to inform the Verification Oversight Organization (VOO) and obtain approval from the facility. Read SLCP's [Verification Observation Requirements](#) for more details. VBs are also required to have policies and procedures around observation to ensure the observation does not impact the outcomes of the verification. These requirements are listed in the [Verifier Body Requirements](#) document.

5. Continuous Improvement

5.1 Feedback Forms

SLCP collects user feedback to improve its processes and quality and learn about the user impact of its processes.

- 5.1.1 Verification Feedback forms for facilities and Verifiers:** After every verification, Verification Feedback forms are sent to facilities and Verifiers to collect data that can contribute to improving verification quality. Completing the form is optional.
- 5.1.1.1 Verification Feedback form content:** Facilities are asked to provide comments on the verification process and Verifier conduct. Verifiers are asked to provide comments on the SLCP verification process.
- 5.1.1.2 Verification Feedback form process:** A feedback form is sent to all facilities and Verifiers after they complete a verification. All feedback is captured and analyzed by the VOO. The VOO provides SLCP with reporting on feedback.
- 5.1.1.3 Verification Feedback form outcomes:** The VOO uses collected feedback to inform Verifier and VB scoring and to determine if any SLCP system users need additional training, guidance, or support. Feedback may result in a formal complaint as outlined in section 5.3; may result in the VOO following up directly with a facility, Verifier, or VB to resolve an issue; or may result in a Corrective Action Request as per section 4.6.
- 5.1.2 SLCP Verification Feedback Survey for Users:** End users of SLCP verified assessment reports (e.g., brands) are prompted to complete an online feedback form when they are given access to the verified assessment report stored on the Gateway. They can provide comments on the completeness and accuracy of report data. Completing the form is optional.

- 5.1.3 Public reporting of outcomes:** The VOO aggregates feedback information from facilities, Verifiers and end-users and posts results on the public SLCP QA Metrics site. Any common issues shall also inform the improvement of SLCP, including the CAF, facility and Verifier training, Calibration Webinars and Helpdesk information.

5.2 Facility Dispute about Verification

Before the facility finalizes the verified assessment, the facility can raise a Dispute related to Verifier conduct, competency, and their implementation of the Verification Protocol.

- 5.2.1 Scope of Disputes:** The Dispute process is used to report on Verifier competency and behavior. Disputes do not resolve issues or disagreements over verification data related to specific questions. If the facility has concerns about specific verification answers and outcomes, the Verifier should be made aware of those concerns at the closing meeting, so they can be swiftly resolved at that time or within two business days of the close of the onsite verification. The facility may also use the 14-calendar day review period before the verified assessment report is finalized to resolve any question level issues directly with the VB. This process does not require VOO involvement and would not be considered as part of the Dispute process.
- 5.2.2 Process to raise Disputes:** Only facilities may raise Disputes. Facilities have 14 calendar days from the date a Verifier submits the verification to the facility for review (assessment status VRC) to raise a Dispute on the Accredited Host platform. Once the Dispute button is pressed on the AH platform, the facility has to complete a form that is submitted to the VOO. A facility has one opportunity per verification to raise a Dispute. Multiple issues may be included within a single Dispute. For example, if the Dispute is raised because the Verifier did not spend enough time on site and because the Verifier did not speak the language of management at the facility, these issues are raised together in one Dispute.
- 5.2.3 VOO Dispute review:** Within 2 business days, the VOO evaluates the Dispute to determine if additional information is needed. The VOO will gather information from the parties (Verifier, facility) to determine the validity of the dispute.
- 5.2.4 Valid Disputes:** Once the necessary information is obtained, the VOO will determine if it is a valid dispute. To be valid, a Dispute shall relate to Verifier conduct or the Verification Protocol and shall relate to a specific verification. Question level issues are not considered valid Disputes.
- 5.2.5 Unsubstantiated Disputes:** If the VOO deems a Dispute “not substantiated”, the VOO sets the status of the verified assessment to VRF on the Gateway. Before this action, the VOO notifies the facility that the Dispute is not substantiated. Four calendar days after the notification to the facility, the VOO sets the status to VRF. Disputes that are not substantiated may be treated as complaints. This does not impact the status of the verified assessment.
- 5.2.6 Substantiated Disputes:** If a dispute is substantiated, the VOO investigates. The facility, Verifier and/or VB may be contacted to provide additional information. The VOO attempts to resolve all Disputes within 10 business days.
- 5.2.7 Outcomes of substantiated Disputes:** There are three potential outcomes of a dispute: the VOO determines an edit to the verified assessment report is needed; the VOO determines the report must be invalidated or the VOO determines no change is required and the report is finalized with no edits.
- 5.2.7.1 Edit(s) required to the verified assessment:** If the VOO determines an edit to the report is needed, the VOO informs the Verifier and facility of the

required edit(s) and changes the assessment status to VRE. The Verifier and the facility have 5 calendar days to edit and review the report. After 5 calendar days the status of the report automatically changes to VRF, unless the facility manually changes the report to VRF on the AH platform prior to day 5.

5.2.7.2 **Report invalidation:** If the VOO determines there were significant issues and the verification meets criteria for invalidation, the VOO informs the Verifier and the facility that the verified assessment report will be invalidated. Four calendar days after the VOO informs the Verifier and the facility, the VOO sets the status to VRI. The data in the verified assessment will not be available for sharing or downloading on the Gateway.

5.2.7.3 **No change:** If the VOO closes the Dispute without impacts to the report, no changes are necessary. The VOO informs the Verifier and the facility that the verified assessment report will not be changed. Four days after the VOO informs the Verifier and the facility, the VOO sets the status to VRF.

5.2.8 Tracking and reporting of Disputes: All disputes received by the VOO are tracked. Outcomes of the Dispute are reflected in the final verified assessment report in one of the following ways:

- Dispute substantiated
- Dispute not substantiated

5.3 Complaints related to Verifier/VB, Verification Process or the SLCP Process

All SLCP users can raise concerns about the SLCP assessment and/or verification process and Verifiers/ VBs through the complaint mechanism managed by the VOO. Each complaint is reviewed by VOO but only valid complaints (see 5.3.2) are further addressed.

5.3.1 Filing a complaint: Any SLCP system user may raise a complaint related to the verification process or SLCP process in general. The complaints form is online and managed by the VOO. If a system or user raises a complaint on an SLCP assessment and/or verification through another channel, they are forwarded to the SLCP or Sumerra Helpdesk and brought to the attention of the VOO. Users can file complaints anonymously.

5.3.2 Scope of complaints: To be valid, a complaint shall relate to an SLCP assessment or the SLCP assessment process. This can include the verification or SLCP implementation or the conduct of its participants (e.g., facilities, Verifiers, VBs, AHs). Complaints relating to pricing or aspects of VB/AH/SLCP signatory business decisions are not considered valid. If the complaint is about SLCP, its Secretariat or the VOO in general, see 5.4. Technology issues relating to Accredited Hosts or the Gateway platform are referred to the appropriate party. Complaints regarding verifications over 2 years old will be incorporated into the aggregated QA data and inform improvement focused interventions with Verifier Bodies/Verifier(s) to elevate Verifier Body/Verifier performance program wide.

A complaint should include relevant details on the nature and content of the complaint and the parties involved, preferably including names and contact details. A complaint can be filed anonymously.

5.3.3 There are multiple ways to bring concerns, issues, complaints, suggestions, and the like to the attention of SLCP and/or the VOO. See the Helpdesk for more details. Some feedback/communication mechanisms may ultimately be filed as a complaint:

5.3.3.1 SLCP user feedback forms with negative feedback that requires further investigation may be treated as a complaint.

5.3.3.2 A Dispute on a verification outcome may lead to or be recategorized

as a complaint.

5.3.3.3 Other feedback received (e.g., Helpdesk ticket) may be categorized and investigated as a complaint.

5.3.4 VOO complaint review: Once the complaint review process has been initiated, the timeline will vary depending on the nature of the verification feedback raised and can take up to 2-3 months to fully reach an outcome. The VOO may reach out to the complainant during the data gathering process for additional information or clarifications to support the verification quality evaluation. Complainant support on these follow up requests is much appreciated and is essential to delivering a timely review of the complaint(s). The VOO may forward complaints to the SLCP Secretariat for further follow up and investigation (see Appendix IV for timelines and process flow).

5.3.5 VOO complaint investigation: If a complaint relates to the verification process (Verifier conduct, Verification Protocol, verified assessment report) the VOO will investigate the case. During the investigation, VOO follows up with all parties involved to gather the pertinent details to determine the next steps. If the complaint relates to general SLCP processes, the Data Collection Tool or the data sharing model, complaints will be forwarded to the SLCP Secretariat. The complainant may be contacted during the investigation to provide additional information.

5.3.6 Complaint outcomes: There are 3 possible complaint outcomes that include substantiated, unsubstantiated, and inconclusive.

5.3.6.1 **An outcome of substantiated** means that there was a deviation from the Verification Protocol requirements by the VBs/Verifiers.

If the complaint is substantiated, then the VOO issues a corrective action request to the VBs/Verifiers. VOO follows up on the progress of the corrective action request and provides feedback on the corrective action plans.

The VOO attempts to resolve all complaints in a timely manner (note: timeline can vary based on the complaint complexity and responsiveness of the parties involved). Once the complaint is resolved, or if it cannot be resolved, the complainant is informed of the outcomes. If the complainant is a member of the QA Stakeholder Program, the complaint outcomes are available on your dashboard and be discussed in the respective quarterly calls.

5.3.6.2 **An outcome of unsubstantiated** means that there was no deviation from the Verification Protocol requirements by the VBs/Verifiers. In case of unsubstantiated complaints, the VOO will inform the complainant via email.

5.3.6.3 **An outcome of inconclusive** means that there was not enough evidence to decisively determine if the complaint can be substantiated or unsubstantiated.

Examples of an inconclusive outcome include (but not limited to):

A scenario where the initial verification did not identify any issues potentially due to an announced assessment, but an unannounced spot check conducted by a brand or another entity, at another time-period, yielded compliance issues which were previously unidentified but could not be fully substantiated. In these cases, there are various factors (i.e., due to different document review time periods; worker interview groups, and the potential inconsistencies associated with announced v. unannounced assessments) that can lead to an inconclusive outcome due to lack of corroboration.

In those instances where the outcome is inconclusive, the VOO will document the identified issues and determine if further investigation is needed

through deployment of onsite QA activities (note: this will be considered on a case-by-case basis).

Additional steps can be taken by the VOO in these instances to add facility alerts in the facility profile to notify the Verifier Body to focus on the non-compliant issues in the next facility verification.

5.3.7 Complaint confidentiality: The VOO makes reasonable efforts to ensure the confidentiality of complaints and the identity of complainants. The VOO refrains from providing names of complainants, Verifiers, VBs, and facilities or providing other identifying information when investigating complaints. If a complaint cannot be investigated without identifying the complainant, the complainant is first informed that their complaint cannot be kept confidential. The complainant is given the option to withdraw their complaint.

5.3.8 Tracking and reporting of complaints: All complaints received by the VOO are tracked, including complaints that are not substantiated. Information can be used to populate the VB/Verifier scorecard and/or dashboards. Learnings gathered are utilized to improve the overall QA program.

The VOO reports to SLCP on the status of complaints on a regular basis. Summary updates are provided to the stakeholders engaged in the QA Stakeholder Program on a quarterly basis. Ad hoc updates can be provided upon request. Not all complaints will be sent a follow up update. Substantiated complaints that relate directly to Verifier or VB performance may impact Verifier and VB scores.

5.4 Formal Complaint about SLCP or the VOO

Anybody can raise a formal complaint against SLCP through the SLCP [website](#). Formal complaints raised through this channel will follow the Dispute Mechanism set forth in the SLCP [Governance Document](#). This Dispute Mechanism is not managed by the VOO and is separate and different from the facility dispute mechanism used prior to finalizing a verified assessment report. Formal complaints are handled by the SLCP Secretariat and Council.

5.5 Report of Confidential and Sensitive Information to SLCP and VOO

Verifiers and/or the VB shall submit details about unconfirmed, sensitive as well as suspicions information related to their assigned facility to the VOO via the [Confidential Information Report Form](#).

5.5.1 Scope: The Confidential Information Report Form shall be used in – but not limited to – the following cases:

5.5.1.1 Sensitive information that the VB/ Verifier cannot use in the report to keep the identity of the worker confidential and to protect the worker from retaliation.

5.5.1.2 Identified non-compliances and/or inaccuracies by the VB/ Verifier that fall outside of the assessment scope timeframe and the facility does not provide permission to include in the report.

5.5.1.3 Verifiers have suspicions about non-compliances/inaccuracies/zero tolerance conditions in the assigned facility but are unable to properly triangulate information.

5.5.1.4 VB/ Verifiers are aware and/ or have experienced unethical facility behavior as defined in 6.1.1 and 6.1.2

5.5.1.5 Information collected through VB's own worker hotline - only if the VB is permitted to share information with the VOO and SLCP.

For more detailed examples please see the [Verification Protocol](#).

- 5.5.2** In any of the cases listed above VB/ Verifier shall immediately submit the form to VOO.
If a Verifier submits the form, it shall be submitted before completing the verified assessment report (i.e., before changing the assessment status to VRC – Verification completed).
- 5.5.3** VOO collects and reviews the Confidential Information Report Forms on an on-going basis.
- 5.5.4** If VOO determines that the information received needs additional investigation, the VOO will follow-up with the VB and/or Verifiers to gather relevant details.
- 5.5.5** VOO will share information collected through the Confidential Information Report with SLCP Secretariat.
- 5.5.6** Information collected through this form will be maintained on a facility profile note visible to SLCP, the VOO and any VB assigned a verification for the applicable facility and will be shared in confidence with applicable approved VBs and Verifiers.

5.6 APSCA Collaboration Agreement

SLCP has aligned with APSCA criteria to monitor and improve the performance of SLCP Verifiers and Verifier Bodies. Under the collaboration agreement, both organizations have now mutually agreed to share alerts and integrity investigations proactively and systematically. APSCA and SLCP will also continue to seek further avenues for engagement that will support a joint vision.

5.7 Stakeholder QA Program

The Stakeholder Quality Assurance Program allows SLCP and its VOO to use QA data gathered by various stakeholders such as brands and standard holders. Many stakeholders review verification reports for quality assurance purposes. Sharing these results with SLCP will allow us to expand the scope of QA beyond what can be provided through the VOO. These partnerships may minimize duplicative efforts on QA activities to enhance SLCP verification data quality and integrity, synchronize SLCP and other QA Programs, and drive overall quality of VBs and Verifiers. See the Helpdesk for more details.

6. Unethical Behavior

SLCP defines unethical behavior as:

Any fraudulent act that can compromise the integrity of the verification process, the authenticity of the data, and the overall credibility of the Program performed by any user of the SLCP system and the Converged Assessment Framework (CAF): a facility, an SLCP approved VB and/ or Verifier.

6.1 Unethical facility behavior

Unethical facility behavior refers to:

- 6.1.1 Facility-led bribery:** any bribery attempts to influence outcomes of a verification by offering, soliciting, or accepting any items of value, including -but not limited to- money, services, merchandise, or gifts (bribery).
- 6.1.2 Other types of unethical facility behavior (excluding bribery):** any attempt to influence the outcome of the verification/ verified data through other means such as:
- 6.1.3** Providing incomplete and/or inaccurate and/or falsified data (e.g., double bookkeeping) that do not fully reflect actual labor conditions in the facility.
- 6.1.4** Deceiving the outcome of the verification through e.g., coaching of workers for

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CONVERGENCE

Verifier interviews, hiding of/ denied access to facility areas, documentation, workers.

6.2 Procedures for handling cases of facility-led bribery

6.2.1 Reporting & notification: If a facility offers a bribe during the verification process:

- 6.2.1.1 The Verifier shall immediately report the event to their manager/supervisor, upper management, or designated representative for handling ethics issues at the VB.
- 6.2.1.2 Once the VB is informed of the allegation, they report the incident to the VOO by sending an email to voo_ethics@sumerra.com
- 6.2.1.3 The VOO shares information with the SLCP Secretariat. All allegations shall be reported to the VOO within 5 days of the initial allegation.

6.2.2 Investigation

- 6.2.2.1 APSCA member VBs: VBs that are APSCA members follow the APSCA process for investigations and reporting of bribery. The APSCA member VB will report the outcome of the investigation to the VOO. If the outcome relates to unethical behavior on the part of the APSCA member Verifier and/or VB, the VOO will inform APSCA of the outcome of the investigation.
- 6.2.2.2 Non-APSCA member VBs: VBs that are not APSCA members take the following steps:
- 6.2.2.3 Within 5 business days of receiving notification of the incident, the VB reports to the VOO on the steps they will take to investigate.
- 6.2.2.4 Investigations shall be done by an impartial person who was not involved in the initial verification.
- 6.2.2.5 The VB proceeds with the investigation and once completed submits the report to the VOO.
- 6.2.2.6 The VOO reviews the investigation report and either confirms that a proper investigation was done and no further follow-up is needed or determines that the VB did not conduct a proper investigation.
- 6.2.2.7 If the VOO determines the VB did not conduct a proper investigation, the VOO may require the VB to take additional steps, the VOO may take over the investigation, or the VOO may refer the matter to the SLCP Secretariat for further action.

6.2.3 Investigation outcomes: If the outcome of the investigation substantiates that the facility offered a bribe, the VOO shall take following action:

- 6.2.3.1 The facility receives an official warning letter from the VOO. The VOO indicates the follow-up action (e.g., invalidation, addendum to report without invalidation).
- 6.2.3.2 The VOO adds an alert to the internal facility profile in the Gateway to communicate the bribery attempt of the facility to all future VBs who accept verification of this facility. The alert is only visible to Gateway administrators, the VOO and the VBs assigned to the facility for verification.
- 6.2.3.3 At the discretion of the VOO, the assessment may be invalidated. If invalidated, the "Assessment Information" section of the report under "Alert from Verification Oversight Organization (VOO)" will indicate "bribery" as the reason for invalidation; the Accredited Host(s) who have access to the facility's report will be notified of the VRI status and can update the status in their systems; the Gateway will inform all email recipients of the (previous) finalized report (recipients who received the report directly from the facility via the Gateway) of the now invalidated verification report.
- 6.2.3.4 If the report is not invalidated and remains in VRF assessment status,

an addendum to the verified assessment report will be added by the VOO in the Assessment Information section of the report to alert readers of the report that a bribery attempt occurred. The Assessment Information section of the report does not affect the verified Data Collection Tool scope. The Accredited Host(s) who have access to the facility's report will be notified of the addendum and can notify applicable users.

6.2.3.5 Depending on the timing of the bribery investigation and the assessment status, the facility may proceed to finalize the report (assessment status VRF), if not already finalized. The facility may also delete the assessment (assessment status ASD), if not already finalized. If the report is finalized (meaning in VRF), the VOO may invalidate it or not.

6.2.3.6 If the assessment status is ASD (because the facility decided to delete the verification rather than finalize it), the VOO is still able to attach an internal note to the assessment indicating the bribery attempt. This note is submitted to the Accredited Host associated with the ASD and the Accredited Host can share this information with the end user.

6.2.4 Multiple facility-led bribery attempts

If the facility has offered a bribe and it is their second attempt to bribe a Verifier:

6.2.4.1 The facility receives an official warning letter from the VOO noting the second bribery attempt and that the verification will be invalidated. The warning letter may also include notification of suspension from SLCP. SLCP reserves the right to suspend the facility from all SLCP activity due to repeated instances of bribery.

6.2.4.2 The VOO shall invalidate the facility's verification if it is in VRF status. The "Assessment Information" section of the report under "Alert from Verification Oversight Organization (VOO)" will indicate "bribery" as the reason for invalidation; the Accredited Host(s) who have access to the facility's report will be notified of the VRI status and can update the status in their systems; the Gateway will inform all email recipients of the (previous) finalized report (recipients who received the report directly from the facility via the Gateway) of the now invalidated verification report.

6.2.4.3 If the assessment status is ASD (because the facility decided to delete the verification rather than finalize it), the VOO is still able to attach an internal note to the assessment indicating the bribery attempt. This note is submitted to the Accredited Host associated with the ASD and the Accredited Host can share this information with the end user.

6.2.4.4 The VOO adds an alert to the internal facility profile in the Gateway to communicate the second bribery attempt of the facility to all future VBs who accept verification of this facility. If the facility is suspended, a record of reason of suspension is maintained.

6.2.5 VOO tracking of facility-led bribery: The VOO tracks all allegations, investigations, and outcomes of cases of bribery and shares this information with the SLCP Secretariat. The VOO tracks Verifier terminations and prevents Verifiers from reapplying or being added to the Gateway.

6.3 Procedures for handling other types of unethical facility behavior

Procedures for handling other types of unethical facility behavior (as listed in 6.1.2) differs depending on whether it is a confirmed behavior or a suspected one.

Confirmed unethical behavior refers to a situation for which Verifier has clear evidence/proof that the facility acted dishonestly.

- 6.3.1 Procedures for handling confirmed unethical facility behavior: If Verifiers have evidence that the facility engaged in any of the types of unethical behaviors listed in 6.1.2, they shall:
 - 6.3.1.1 Select “Yes” for the question: “VD-VERI-19: Did the facility engage in behavior that impacts process integrity (e.g., incomplete, inconsistent, or falsified documents; action by management to prevent workers from speaking freely; attempted concealment of underage workers; misleading/ lying to Verifier/Assessor about facility operations; or other non-disclosure of accurate data)?”
 - 6.3.1.2 Then enter relevant details in the Tool section “Verification/Assessment Observation” under VD-VERI-18: Cooperativeness of facility.
 - 6.3.1.3 Immediately report the finding to the VOO via the Confidential Information Report Form. Procedures on the Confidential Information Report Form are detailed in 5.5.
 - 6.3.1.4 End the verification immediately if subject to any form of intimidation (e.g., through threats and/or harassment) by the facility.

For further details on how to report confirmed unethical facility behavior see the [Verification Protocol](#) and in the [Verifier Guidance](#).

- 6.3.2 **Procedures for handling suspected unethical facility behavior:** If Verifiers are not able to prove that the facility engaged in any of the of unethical behaviors listed in 6.1.2 they shall:
 - 6.3.2.1 Immediately report the suspicion to the VOO via the Confidential Information Report Form. Procedures on the Confidential Information Report Form are detailed in 5.5.
- 6.3.3 **First notification of suspected unethical facility behavior**
 - 6.3.3.1 Upon receipt of the form, VOO reviews the details and shares the details with SLCP Secretariat.
 - 6.3.3.2 Information collected through the Confidential Information Report Form will be added as a facility alert in the profile to notify the next VB as detailed in 5.5.6.
- 6.3.4 **Multiple notifications of suspected unethical facility behavior:** If VOO receives a suspected notification for the second time- via the Confidential Information Report Form -the Verifier suspects that the same facility has engaged in any type of unethical behavior as listed in 6.1.2, the VOO will take the following steps:
 - 6.3.4.1 The VOO will open an investigation to collect further information related to the alleged misconduct of the facility. The VOO will decide on a case-by-case basis how to involve the facility as well as other relevant parties to the investigation. If necessary, the VOO will request additional information from the involved parties.
 - 6.3.4.2 If the investigation substantiates that the facility did engage again in unethical behavior, the VOO will apply the same consequences as for multiple facility-led bribery attempts (listed in 6.2.4).
- 6.3.5 **VOO tracking of facility unethical behavior cases:** The VOO tracks all allegations, investigations, and outcomes of investigation cases on facility unethical behavior and shares this information with the SLCP Secretariat.

6.4 Unethical Verifier behavior

Unethical Verifier behavior occurs whenever Verifiers engage in fraudulent acts that are in clear violation of any of the ethical principles outlined in the SLCP Code of Conduct and that can lead to a misrepresentation to the Verifier activity and of the verification (e.g., Verifier-led bribery, identity fraud, unprofessional behavior).

6.5 Procedures for handling cases of unethical Verifier behavior

6.5.1 Reporting & notification: If facilities or end-users experience/ have evidence and/or have suspicion that Verifiers did not follow the [SLCP Code of Conduct](#), they shall:

6.5.1.1 Immediately report the incidence to the VOO sending an email to voo_ethics@sumerra.com. In the event of Verifier-led bribery, proof (e.g., photo) of the bribery shall be attached to the email as well.

6.5.1.2 Depending on the allegation, the VOO will inform the SLCP Secretariat.

6.5.2 Investigation

6.5.2.1 Verifier unethical behavior investigations are led and managed by the VOO with support from SLCP as needed.

6.5.2.2 The VOO will decide on a case-by-case basis how to involve the VB associated with the applicable Verifier as well as other relevant parties to the investigation. If necessary, the VOO will request additional information from involved parties.

6.5.2.3 The VOO investigation is primarily aimed at defining:

- Circumstances under which the alleged misconduct occurred
- Role and responsibility of the Verifier
- Possible implications of VB/ other Verifiers
- Possible impacts on the quality of SLCP data
- Consequences on Verifier status and/or Verifier performance score

6.5.2.4 VOO aims at closing all investigations within 90 days from receipt of the official complaint, but the length of the process can vary on a case-by-case basis.

6.5.6 Investigation outcomes

6.5.6.1 **If the complaint/ allegation is substantiated**, the Verifier shall be suspended for a minimum of 12 months or be terminated, as per the [Verifier Body Requirements](#)

6.5.6.2 **If the Verifier is an APSCA Auditor Member**, APSCA'S process for sanctioning auditors shall be followed as described in the [Verifier Body Requirements](#) shall take the following actions:

6.5.6.3 The VOO sends an official notification letter to the Verifier to notify them of the measures taken as a result of the ethical investigation (e.g., suspension, termination).

6.5.6.4 The VOO sends an official notification letter to inform the VB of the results of the investigation and the measures taken towards the Verifier and, if applicable, towards the VB (e.g., suspension, termination, corrective action request). Procedures to lift Verifier and/or VB suspension are defined in the [Verifier Body Requirements](#). In case of Verifier/VB suspension and/or termination, VOO will send an official notification to the facilities that have been associated with the Verifier/VB through a verified assessment report in the previous 12 months.

6.5.6.5 At the discretion of the VOO, the assessment may be invalidated. If

invalidated, the “Assessment Information” section of the report under “Alert from Verification Oversight Organization (VOO)” will indicate “Verifier unethical behavior” as the reason for invalidation; the Accredited Host(s) who have access to the facility’s report will be notified of the VRI status and can update the status in their systems.

6.5.7 VOO Tracking of Verifier unethical behavior: The VOO tracks all allegations, investigations, and outcomes of cases of unethical behavior and shares this information with the SLCP Secretariat. The VOO tracks Verifier terminations and prevents Verifiers from reapplying or being added to the Gateway.

6.6 Unethical Verifier Body behavior

Unethical Verifier Body behavior is defined as any breach of the ethical principles outlined in the SLCP Code of Conduct (e.g., breach of duties of impartiality and/or integrity).

Procedures for Verifier Bodies unethical behavior are detailed in the Verifier Body Requirements. Therefore, the QA Manual does not include details on procedures/ processes related to VB unethical behavior.

7. Report Invalidation after VRF due to Scheduled Onsite/ Offsite QA Activities

While the purpose of QA activities is to assess quality, some QA activities such as assessing the correctness of specific verified assessment reports to understand quality may uncover issues that compromise the validity of verified assessment reports. In extreme cases, the VOO will invalidate a verified assessment report to protect the integrity of SLCP. The VOO and SLCP reserve the right to invalidate verified assessment reports at any time. Report invalidations are typically due to cases meeting criteria listed in [Appendix III](#).

7.1 Invalidation Process

The VOO notifies the facility and VB of a report’s invalidation by email with a brief explanation for report invalidation. Four calendar days after the facility and VB are informed, the VOO sets the report status to VRI on the Gateway.

7.2 Reporting of Invalidation

- 7.2.1** The VOO updates the report status to VRI and enters the reason for invalidation. Reasons can be as follows:
- Verification Invalidated – Verification quality/accuracy.
 - Verification Invalidated – Significant verification protocol deviation.
 - Verification Invalidated – Facility unethical behavior.
 - Verification Invalidated – Verifier unethical behavior.
- 7.2.2** The selected reason will appear in the verified assessment report in the “Assessment Information” section. The status VRI will be visible in the public list of facilities.
- 7.2.3** The Accredited Host(s) who have access to the facility’s report will be notified of the VRI status and update the status in their systems.

7.3 Impacts to VB Scoring

Instances where reports are invalidated due to error or oversight by the Verifier and/or VB will result in a Corrective Action Request and may impact scoring.

8. Post VRF Addenda and Edits

With a few exceptions, once a report is finalized (VRF) the verified assessment data cannot be edited. The VB is required to conduct an internal quality review to identify errors, mistakes, and inconsistencies during the 10-day report writing periods for all reports and the facility (owner of data) has a 14-day review period to also identify errors, mistakes and inconsistencies and alert the VB and Verifier(s).

However, there may be cases where mistakes are not identified in this review process or are identified via VOO QA Manual sections 8.1 and 8.2.

8.1 Exceptional Circumstances Requiring Edits

- 8.1.1 The SLCP or VOO may determine, at their discretion, that there is a material error that can and should be rectified in the report.
- 8.1.2 Generally, these material errors are in the profile data and therefore the change will not significantly change the VRF content. For example, the address of the facility has a transposed number (e.g., 1324 instead of 1234).
- 8.1.3 The VOO notifies the Verifier Body, Verifier(s), and Accredited Host (AH) of the situation and will temporarily change the status to VRE.
- 8.1.4 The Verifier will be instructed to make the change, or the change may be made directly by the VOO in coordination with the AH.
- 8.1.5 Once the change is confirmed, the VOO will change the status back to VRF and alert all parties that the change is completed.
- 8.1.6 The VOO will post the edits in the "Assessment Information" section of the report under "Alert from Verification Oversight Organization (VOO)". The note will be indicated as "VOO Approved Edit".

8.2 Report Error Addenda

- 8.2.1 If incorrect Assessor/Verifiers selections are discovered by a facility, Verifier Body, or the VOO through the QA or other processes, an addendum can be requested.
- 8.2.2 Addenda are only intended to update incorrect Facility Self/Joint Assessment responses and Assessor/ Verifier selections that were made and not corrected during the last Verification.
- 8.2.3 Facilities shall request addendums in any of the following scenarios occur:
 - 8.2.3.1 Incorrect Facility Self/Joint Assessment responses and/or Assessor/Verifiers selections that was not addressed during the 14-day review period.
 - 8.2.3.2 Verifier missed reviewing the provided documentation during the verification.
 - 8.2.3.3 Verifier misinterpreted the legal requirements during the verification.
 - 8.2.3.4 VRF data selections are inconsistent within the same assessment category and the correct Assessor/Verifier selection(s) can be reasonably determined using triangulation.
- 8.2.4 Facilities shall not request an addendum for scenarios which involve any remediation actions, requirements for the report user, and/or corrective actions taken by the facility after the verification (such cases will not qualify for consideration).

Examples of scenarios for which an addendum request shall not be submitted

include:

- Facilities provided ‘misunderstanding’ as the rationale for the addendum request.
 - Facilities created the documentation after the verification for policies and procedures that were not in place during the verification.
 - Facility added infrastructure improvements after the verification.
 - Inclusion of end-user specific criteria which reflects alignment with user code of conduct requirements.
- 8.2.5** If any of the scenarios described above occur, addendum requests must be generated by the facility, the owner of the data, by using this SLCP – Request for VRF Revisions form.
- 8.2.5.1 In the submission form the facility will be asked to summarize and propose specific data changes for review and approval.
- 8.2.5.2 Facilities shall complete all the applicable fields in the form and provide sufficient details. Facilities shall provide, for example, all the relevant details associated with the addendum submission (PRJ#, facility name, question IDs, proposed Assessor/Verifier Selections, etc.).
- 8.2.5.3 If the form is incomplete, it will lead to delays in processing.
- 8.2.5.4 Only 1 addendum per assessment is permitted within 3 months of the VRF assessment completion date (any additional addendum requests beyond the initial submission will not be processed).
- 8.2.6** The details of the addendum request are sent to the VB for review and approval.
- 8.2.6.1 VB contacts the facility to discuss any corrections and the addendum request process once the form is received by the Verifier(s).
- 8.2.6.2 Verifier completes all sections in the submission form in the ‘blue’ section under ‘VB Approved Changes’ (if the form is incomplete, it will lead to delays in processing).
- 8.2.6.3 Verifier shall approach the handling of the addendum requests using the same guidelines as outlined in the [Verification Protocol](#).
- 8.2.6.4 Any delays on the VB end in responding to the facility addendum request and/or delays in responding to VOO follow up may result in VB account deactivation.
- 8.2.7** Once the proposed edits are agreed upon by both the VB and facility, the VOO will review and either approve or deny the request.
- 8.2.7.1 The VOO may contact the VB and/or facility-to gather additional details regarding the request.
- 8.2.7.2 The request may be denied on technical grounds or if it is suspected that changes are proposed in violation of protocols or due to ethics concerns.
- 8.2.7.3 Any remediation actions, report user requirements, and corrective actions taken by the facility after the Verification will not be considered.
- 8.2.7.4 In all revision cases, it is necessary to get the agreement of the facility, the VB, and the VOO (and if needed, the SLCP Secretariat)
- 8.2.8** If approved, the VOO will post the details in the “Assessment Information” section of the report under “Alert from VOO”. The note will be indicated as “Addendum to Report”.

- 8.2.9 In instances where the addendum request is rejected, facilities have the option to submit a new self-assessment and schedule a new verification to reflect any changes in facility circumstances and or conditions since the last verification.
- 8.2.10 The following table provides an estimated timeline on the addendum process from the facility submission date to the final approval/rejection (in some cases the turnaround time may exceed the estimate).

Action	Timeline
Facility submits to Verifier Body for review	1-2 weeks
Request is routed by the VB to the VOO for review	1-2 weeks
VOO may follow up with the VB to gather more information	1-2 weeks
VOO may follow up with the facilities to gather information	1-2 weeks
VOO conducts the final review after VB/facility responses	1-2 weeks

8.3 Important Addenda Findings

- 8.3.1 While a report is in VRF, QA activities may identify serious issues but issues not severe enough to call for report invalidation. For example, if a Counter Verification identifies a case of child labor but concludes that the child’s employment started after the initial verification took place, this would not be considered a serious oversight by the Verifier and therefore not a cause for report invalidation. In these cases, the VOO will alert users of the verified assessment report to this important issue through an update to the verified assessment report.
- 8.3.2 The VOO shall inform the facility in writing of this additional addendum to the VRF. The VOO sends to the facility the exact language/ text that will be used in the addendum.
- 8.3.3 The facility can provide comments and suggest changes to the text within 4 calendar days of the notification submitted by the VOO.
- 8.3.4 The VOO will post the addendum within 6 calendar days of the written notification to the facility.
- 8.3.5 The VOO will post the addendum in the “Assessment Information” section of the report under “Alert from Verification Oversight Organization (VOO)”. The note will be indicated as “VOO Addenda”.
- 8.3.6 Inquires on the addendum submission process can be sent to VOO via email slcp@summera.com.

9. Public Quality Assurance Communications

The purpose of SLCP public QA communications is to educate interested parties about SLCP data integrity and quality, drive quality across verifications, VBs, and Verifiers, and establish feedback loops with transparent and open communication.

9.1 Communication Channels

SLCP maintains multiple sites to communicate data integrity and quality information and progress: [SLCP website](#), [SLCP QA Metrics site](#) and [SLCP Helpdesk](#). We also hold [webinars](#) to keep our

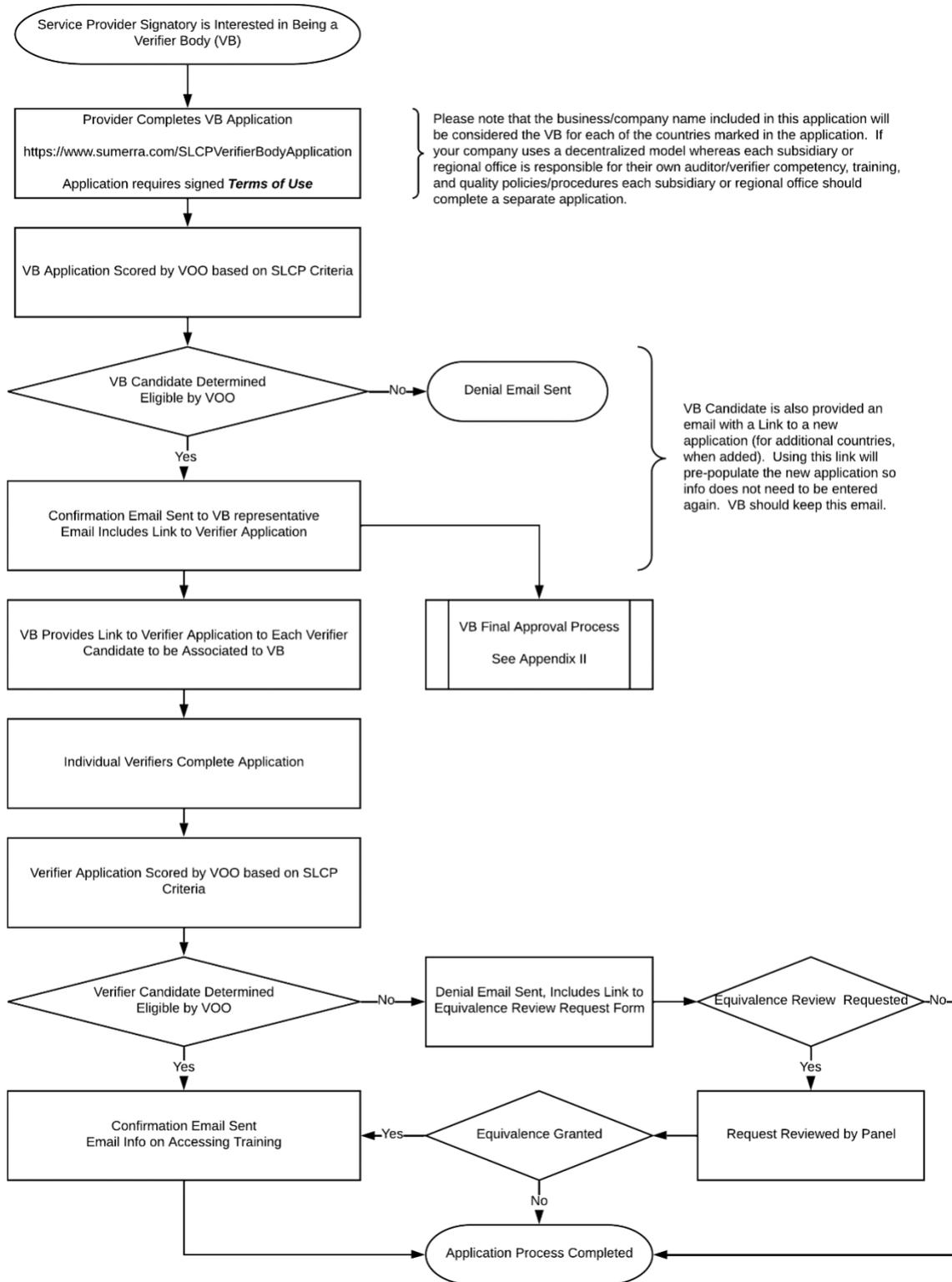
Converged Assessment.
Collaborative Action.
Improved Working Conditions.

**SOCIAL & LABOR
CONVERGENCE**

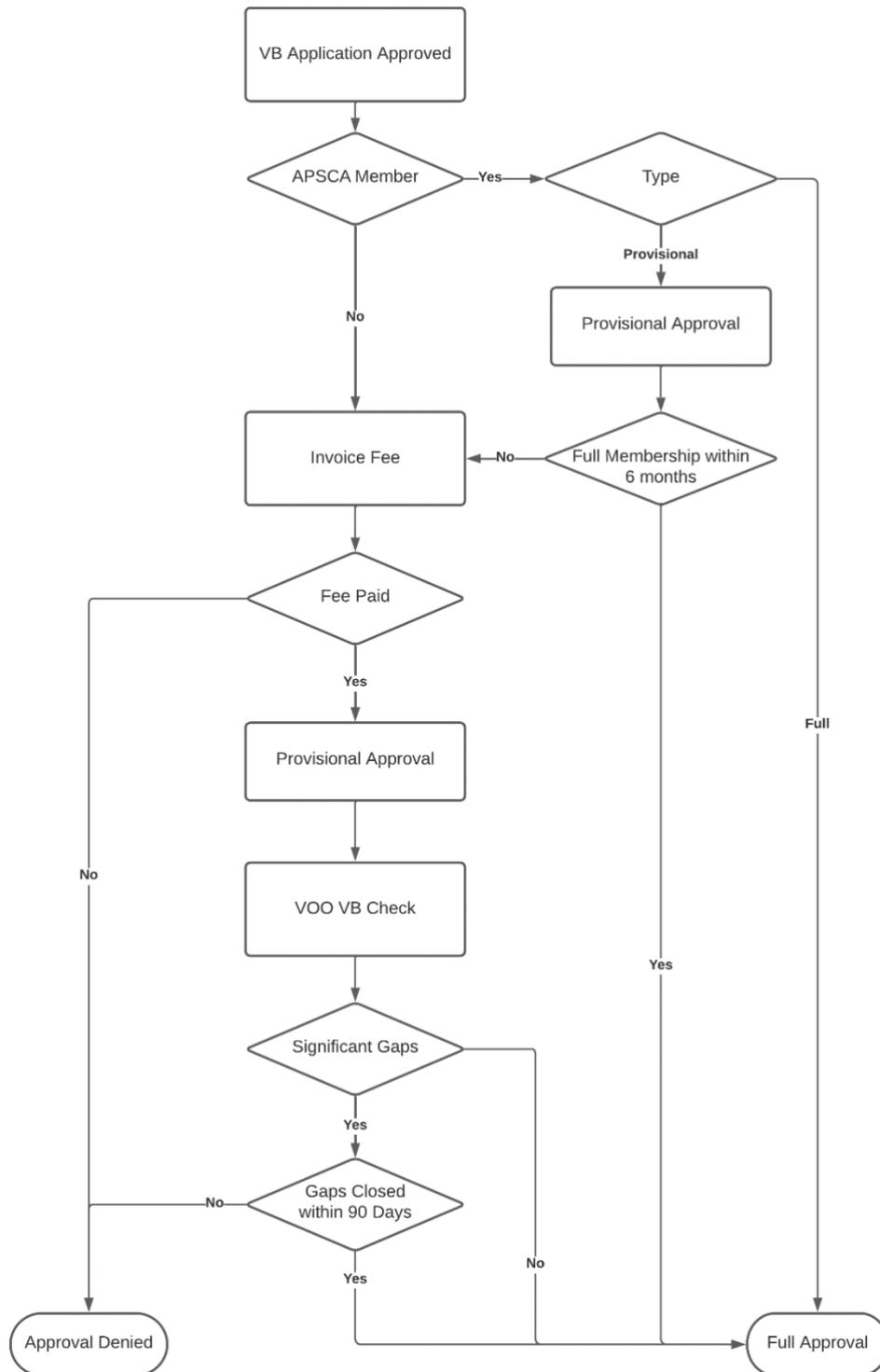
stakeholders informed and issue yearly reports on our [Signatory Portal](#) to show progress and learnings.

Appendices

Appendix I – VB & Verifier Selection Process



Appendix II – VB Full Approval Process



Appendix III – Criteria of Report Invalidation

In some cases, it is necessary to invalidate a verified assessment report. Invalidation is not a preferred option but may be used at VOO/SLCP discretion if a verified assessment report meets the criteria listed below.

When a verified assessment report is considered invalid, the status “Verification Invalidated” (VRI) is attributed in the Gateway and all stakeholders (facility, Verifier Body, end user) are notified via email (facility, VB, end user who received the report directly via the Gateway) or through viewing of assessment status information on the [facilities public page](#) and/or Accredited Host platform (end user).

Verified assessment report may be considered invalid when:

1) Basic protocols are not met:

- a) Tool not completed in English
- b) Verifier did not utilize qualified in person translators to sufficiently cover the primary languages of workers during interviews
- c) Verifier did not spend sufficient person-days on site as per the Protocol
- d) Verifier changes data at the request of facility without sufficient knowledge or evidence supporting the change

2) Basic quality standards are not met:

- a) Significant number of inaccurate verification selections or ‘non-compliance’ flags not supported with evidence or Verification Data
- b) Significant number of material inconsistencies between Verification Selections and/or Verification Data throughout the report

3) Verifier requirements are not met:

- a) Verifier not approved by VOO either overall or for country/region of facility
- b) Verifier visiting facility for second time in a row without a documented exception
- c) Verifier supported facility in the joint-assessment or provided consulting to facility within 2 years prior to verification

4) Significant issues with the verification process are found:

- a) Evidence of bribery (solicited or accepted by Verifier)
- b) Verifier was denied access to facility grounds (entirely or in part)
- c) Verifier was denied access to workers (interviews)
- d) Verifier was denied access to material information (documents)
- e) Observations/evidence at the verified site were purposely omitted from the report
- f) Discovery of significant transparency issues by the facility (e.g., double books that were not discovered by Verifier at the time of verification)

5) Other significant quality or Protocol issues, or issues that cause the verified assessment report to be considered wholly unreliable or inaccurate

Appendix IV - Complaint Handling Process and Timelines

