

SLCP Verifier Body Requirements

Version 1.4

Latest Update: December 2, 2025

Change Log

Date	Section	Change Summary
2025/12/02	Reorganization of entire document	Moving existing requirements around Creating clearer headings/ sections New section names and numbers
2025/12/02	Section 1.1: Applicable Standards and Requirements	Clarification on applicable standards and requirements for SLCP-approved VBs, including consequences for non-compliance.
2025/12/02	Section 1.2: In-country Experience	Requirement for VBs to demonstrate relevant in-country social and labor experience Requirement for VBs to demonstrate a management systems approach supporting Verifiers in applied countries
2025/12/02	Section 1.3: Language of Documentation	Requirement for VBs to maintain documented policies and procedures in both English and the local language
2025/12/02	Section 1.4: Retention of Verification Records	Requirements for retention of verification records. <ul style="list-style-type: none"> • VBs to maintain an effective system for tracking and retrieving pre- and post-verification records. • VBs to retain all verification records,
2025/12/02	Section 1.5: Timely Response	Requirements for VBs to respond promptly to VOO requests.
2025/12/02	Section 2: VB Status: Active	VB Status <ul style="list-style-type: none"> • Payment of mandatory fee is required • Active VBs with APSCA membership eligible • Active VBs are listed publicly once they have at least one approved and active Verifier.
2025/12/02	Section 3: VB Status: Deactivated	<ul style="list-style-type: none"> • VBs suspended or terminated are marked “deactivated” in the Gateway • Pending activities must be completed to limit impact on facilities. • Deactivated VBs can be reactivated after completing required VOO activities
2025/12/02	Section 4: VB Status: Suspension	Rules and examples for VB suspension. <ul style="list-style-type: none"> • Causes include failure to remediate, unethical behavior, missed CAP timelines, insufficient CSCA etc. • VBs notified by VOO before suspension; given chance to avoid it. • Suspension process: VOO informs VB. • Suspended VBs deactivated; pending activities must be completed
2025/12/02	Section 5: Lifting VB Suspension	No new instances of ethics or quality breach during suspension period for reactivation
2025/12/02	Section 6: VB Status: Terminated	<ul style="list-style-type: none"> • Rules and examples for VB termination. • Causes include repeated failure to improve assessment quality after Level 3 interventions, repeated unethical behavior, including severe breaches reported outside SLCP, creating a new VB with the same management/resources without disclosure.

2025/12/02	New: Verifier Status & Eligibility	Section name changed from Verifier Status Maintenance to Verifier Status & Eligibility
2025/12/02	Section 7: VB Responsibility	VBs must ensure active Verifiers maintain ASCA status and have clear pathways to become CSCA
2025/12/02	Section 8: Verifier Status: Active	Only Active Verifiers with ASCA/CSCA in Good Standing can perform SLCP activities; each verification must include at least one CSCA.
2025/12/02	Section 9: Maintaining Active Status	Maintaining ASCA/CSCA in Good Standing
2025/12/02	Section 10: Verifier Status: Deactivated	<ul style="list-style-type: none"> • Verifiers suspended, separated, or terminated are marked "Deactivated." • Expired Verifier status due to unmet VSM requirements results in deactivation. • Reactivation process outlined • Deactivated Verifiers cannot perform new SLCP activities; pending activities must be completed. • Reactivation timelines vary based on circumstances
2025/12/02	Section 11: Verifier Status: Suspended	<ul style="list-style-type: none"> • Causes include confirmed or repeated unethical behavior and repeated low-quality performance. • Minimum 12-month suspension for unethical behavior; • suspension for low-quality performance varies. • Process and reactivation outlined
2025/12/02	Section 12: Lifting Verifier Suspension	Confirmation from APSCA on ASCA/CSCA status during reactivation
2025/12/02	Section 13: Verifier Status: Terminated	<ul style="list-style-type: none"> • Cause repeat breaches causing serious harm to SLCP credibility, confirmed bribery, recurring unethical behavior, or APSCA membership revocation.
2025/12/02	Section 14: Roles and Responsibility	<ul style="list-style-type: none"> • Failure to designate/register Administrators results in temporary VB deactivation. • Changes in VB Administrators must be reported to VOO • Key VB Administrators are mandatory and must be separate individuals. • Key roles may overlap with other roles if primary tasks are not compromised. • Supporting VB Administrators cannot hold Verifier and Report Quality Reviewer roles for same reports • Primary Scheme Manager shall attend VB General Calibrations • Primary Quality Manager shall attend VB Regional Calibrations
2025/12/02	Section 15: Competency	<ul style="list-style-type: none"> • Procedures must be documented in English and the local language • B Administrators must stay up to date on key SLCP program changes • VB Administrators must have a strong understanding of how to access and use the individual VB dashboard
2025/12/02	Section 16: Training	<ul style="list-style-type: none"> • Inclusion of subcontracted and temporarily suspended Verifiers in training requirements Detailed procedures for SLCP-specific onboarding training including materials, format, length, and scope

2025/12/02	Section 17: Calibrations	<ul style="list-style-type: none"> Detailed process and requirements for VB General Calibration, VB Regional Calibration and VB In-person Forum
2025/12/02	Section 21: informing VOO of Staff Changes	<ul style="list-style-type: none"> Subcontracted Verifiers explicitly included in reporting staff changes Failure to inform VOO leads to temporary deactivation Requirement for all new and existing ASCA and CSCA Verifiers to list SLCP in their APSCA profile, with failure potentially leading to temporary deactivation
2025/12/02	Section 22: Transfer of SLCP Verifier Approvals	<ul style="list-style-type: none"> Approval is transferrable only between approved "active" full APSCA member VBs Complete all pending SLCP activities before transfer Transferred Verifiers can only maintain countries that the new VB is approved for
2025/12/02	Section 23: Translator Qualification	<ul style="list-style-type: none"> Verifier shall identify translator ahead of verification, failure to do so will result in fee-based CAR Verifier shall include presence of translation in the report
2025/12/02	Section 24: SLCP Performance monitoring and scoring	Details on the three scoring elements as per the updated SLCP New Scoring Model launched in 2025
2025/12/02	Section 25: VB monitoring performance and its Verifiers	VB procedure for monitoring quality performance of its Verifiers documented
2025/12/02	Section 26: Integrity Oversight Program	Added Risk Level 0 and updated all the related interventions for all risk levels
2025/12/02	Section 27: Corrective Action Request	Updated entire sections on CARs with the updated Cap/CAR Management Fee model introduced in 2025 with fee-based CARs and Key Quality Issue Category List.
2025/12/02	Section 28: Corrective Action Plan	Updated the entire section with the CAP Portal, expanding field that should be included in CAP and timeline for CAP submission
2025/12/02	Section 29: Shadow Verification by Interested Stakeholders	Updated the name of the section and added General Process to explain the process of shadow verification. The Verifier shall include presence of any observe in the report.
2025/12/02	Section 30: Ethics and Integrity Procedures	Improper use of Verifier credentials and misrepresentation of roles with all stakeholders.
2025/12/02	Section 32: Facility Training	<ul style="list-style-type: none"> Suspended VBs who are also TBs will be suspended from both roles simultaneously Trainers must not be the same individuals conducting onsite or virtual verifications.
2023/08/21	Revised content	4. VB Status: suspension 5. Lifting VB suspension 14. Roles and Responsibilities 15. Competence 16. Training 17. Calibration 23. Translator qualification 27. Corrective Action Requests • 28. Corrective Action Plans

2021/07/22	Reorganization of entire document	Moving existing requirements around Creating clearer headings/ sections New section names
2021/07/22	Use of shall instead of must	Differentiating shall and should
2021/07/22	New content	Glossary 1. General Requirements (more requirements) VB Status & Eligibility (2. – 6.) Verifier Status & Eligibility (7. – 13.; some content old requirements but moved to this new section) 14. Roles and Responsibilities Performance Monitoring (24. – 26.) 28. Corrective Action Plans (more requirements) Annex 1
2021/07/22	Revised content	15. Competence 16. Training 20. Subcontracted Verifiers 27. Corrective Action Requests 29. Procedures for Observations of Verifications 31. Impartiality 35. Penalties for non-payment
2020/12/17	New: Freelance and Subcontracted Verifiers	Entire new sub-section 8. Freelance Verifiers Entire new sub-section 9. Subcontracted Verifiers
2020/12/17	10.3 new requirement	New addition to 10. Informing the VOO of staff changes Addition addresses APSCA status changes
2020/12/17	New: Observations of Verifications by Brands	Entire new sub-section 13. Procedures for Observations of Verifications
2020/12/17	14.4 change in requirement and new requirement	New addition to 14. Ethics and Integrity Procedures • How Verifiers can raise concerns about ethical issues, including when a facility offers a bribe or acts unethically • How facilities can report on instances where Verifiers solicit or accept bribes or act unethically
2020/12/17	15.4 change in requirement	Change to 15. Impartiality 15.4 If a Verifier engages in consulting work (including but not limited to advisory and training services) at a facility, they are prohibited from conducting verifications at that facility for a period of 2 years.
2020/12/17	18.5 new requirement	New addition to 18. VB Fees 18.5 Invoices for fees are issued by SLCP to the VB head office (the main point of contact for the SLCP program). SLCP does not split invoices or issues invoices to a VB's regional office.
2020/12/17	New: Corrective Action Requests, Terminations and Suspensions	Entire section new with sub-sections: 20. Corrective Action Requests 21. Corrective Action Plans 22. VB suspension 23. Verifier Suspension

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Glossary

Item	Definition
APSCA	The Association of Professional Social Compliance Auditors (APSCA) is the industry association created to support individuals and organizations by promoting the use of independent social compliance audits as a tool to advance workplace conditions globally.
ASCA/CSCA	<p>CSCA (Certified Social Compliance Auditor): A fully certified APSCA auditor qualified to conduct independent social compliance audits.</p> <p>ASCA (Associate Social Compliance Auditor): An entry-level auditor registered with APSCA, gaining experience under supervision of CSCA.</p>
Verifier Body (VB)	The organization that employs and manages Verifiers. Responsible for assigning Verifiers when an SLCP verification is requested.
Verifier (VE)	Person approved to perform an SLCP verification. Responsible for assessing the completeness and accuracy of the data collected through self/joint-assessment of facilities, using the CAF.
Verification Oversight Organization (VOO)	Entity responsible for the day-to-day management of SLCP verifications. Selects, approves and manages VBs and Verifiers, 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, manages the scoring system for SLCP approved Verifiers and VBs, collects Verifiers' performance data, provides verification support desk for all SLCP system users and handles dispute resolution between a facility and a Verifier.
Gateway	<p>The central repository of SLCP verified assessments. All verified assessments are stored safely on an UN server. Registered facilities always have access to their verified assessments and can download these. Apart from this the Gateway serves 4 critical functions:</p> <ol style="list-style-type: none"> 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, Verifier Bodies and Verifiers 3. Management of statuses of the SLCP assessment cycle. Facilities can see the status of their SLCP assessment throughout and at all times. 4. Re(distribution) of verified assessments (VRF status) with facility permission.

Item	Definition
Deactivation	<p>Deactivations are issued to Verifier Bodies and/or Verifiers on the Gateway due to suspension, separation from approved VB, or a temporary status related to failure to conduct required activities and termination.</p> <p>Deactivated profiles may not perform activities on behalf of SLCP. With a deactivated status, Verifier Bodies cannot assign Verifiers through the Gateway and can therefore no longer conduct new verifications and/or perform verification related services.</p> <p>If deactivation is not related to suspension or termination, it will then be a temporary status until the Verifier Body/ Verifier completes the required activities. After the Verifier Body/ Verifier completes the required activities, within 3 working days, the Verification Oversight Organization will reactivate the Verifier Body/ Verifier on the Gateway.</p>
Suspension	Suspension means a Verifier or Verifier Body is removed from the SLCP system for a defined period. Suspensions are communicated publicly on the VB public list .
Termination	Termination means complete removal from SLCP and no possibility of re-entering SLCP as a VB or Verifier.
Use of 'shall' or 'should'	The word 'shall' indicates a requirement and the word 'should' indicates a recommendation.

Introduction

This document outlines the requirements that SLCP Verifier Bodies (VBs) shall meet to maintain their status as approved VBs.

Scope

This document applies to all SLCP approved VBs.

Requirements

1. General Requirements

1.1. Applicable Standards and Requirements: All SLCP approved VBs are subject to SLCP VB Terms of Use, CAF Terms of Use, SLCP Code of Conduct, the APSCA Code and Standards for Professional Conduct, the Quality Assurance procedures outlined in the QA Manual, Quarterly/Regional Webinar content and other applicable program related Comms and Technical Bulletins and the VB requirements outlined in this document. Any breach of any of these documents may result in deactivation, suspension, fee-based penalties or termination of the VB and/or Verifier.

1.2. In-country experience: All VBs shall have relevant in-country social and labor experience in all countries where they conduct verifications or plan to expand through supplemental applications.

During the application phase (both initial and supplemental), VBs shall demonstrate that they, as an entity, have conducted social and labor audits in the country within the previous 36 months. VBs cannot meet this requirement solely through recently hired Verifiers whose experience was gained with previous employers. For example, if a VB submits a supplemental country application without prior in-country audit experience as an entity but has recently hired a Verifier who has such experience from a prior employer, the VB will not be eligible for approval in that country. In such cases, the VB itself lacks the required audit experience.

1.2.1. The VB shall also be able to demonstrate prior experience in maintaining a management systems approach supporting the VB's Verifiers (employee and subcontracted) for the applied country or countries.

1.3. Language of documentation: VBs shall maintain documented policies and procedures in English, as well as in the local language. This documentation will be requested by the VOO during the VB Management Systems Check or may be requested at any time based on identified gaps.

1.4. Retention of verification records

1.4.1. VBs shall maintain an effective system in place to keep track of and retrieve records for all pre and post-verification activities conducted to ensure a smooth data sharing with SLCP, VOO and APSCA.

1.4.2. VBs shall maintain and retain all pre and post-verification activities records, including verification notes captured by all Verifiers to support future VRF clarification request inquiries from SLCP and the VOO; this requirement also applies to scenarios where Verifiers may no longer be affiliated with the VB. It is the VB's responsibility to ensure that applicable records are made available upon request.

1.4.3. VBs shall maintain verification related records and notes for future reference related to all verifications conducted in the past 24 months at a minimum, including in scenarios where the VB may no longer be an active SLCP VB.

1.5. Timely response



- 1.5.1. All VBs shall respond to any reasonable requests for information from the VOO within 48 hours.
- 1.5.2. Repeated failure to respond within 48 hours can lead to deactivation or suspension at the discretion of the VOO. Examples of VOO requests include but are not limited to:
 - 1.5.2.1. VOO request for VB schedule of future verifications for the purpose of scheduling Shadow/Counter/Duplicate Verifications.
 - 1.5.2.2. VOO requests additional verification clarification related to information on any potential protocol violations as part of the VB outreach process to determine potential subsequent CAR issuance. Not all instances of VRF clarification requests will result in a CAR.
 - 1.5.2.3. VOO requests registration or contact information of program administrators or local offices.
 - 1.5.2.4. VOO requests details on verifications in support of VRF complaints, Counter, Duplicate and Shadow Verifications, Desktop Reviews, facility disputes, or ethics and quality investigations.
 - 1.5.2.5. VOO requests details on how VBs ensure Verifier(s) (including for subcontracted Verifiers) attendance onsite and validate the related information with the provision of reliable evidence.
 - 1.5.2.6. Other reasonable VOO requests needed to conduct its duties in overseeing the SLCP verification program.

VB Status & Eligibility

2. VB Status: Active

- 2.1 After applying, paying the mandatory fee and receiving approval from VOO, VBs are granted an Active status in the SLCP Gateway. Payment of the fee does not guarantee an automatic approval; VBs to review requirements prior to submission of applications. See the [SLCP Helpdesk](#) for more details.
- 2.2 Only VBs with an Active status and APSCA full and/or provisional membership are eligible to apply for program approval and perform SLCP verification activities. See the [SLCP Helpdesk](#) for more details.
- 2.3 Active VBs are listed in the publicly available [VB Active List](#) once the VB has qualified at least 1 approved and active Verifier.

3. VB Status: Deactivated

- 3.1 Any VB due to suspension and/or termination is marked as “deactivated” in the Gateway.
- 3.2 Deactivated VB is ineligible to perform any new SLCP activities, including verifications.
- 3.3 Any pending activities, including any verifications initiated prior to the deactivation, are to be completed as planned by the VB to limit the impact on the facilities.
- 3.4 Deactivation can result in reactivation after following and completing the required activities listed by the VOO. Timelines for reactivation will vary depending on the specific VB circumstances.

4. VB Status: Suspension

- 4.1 Examples of scenarios leading to VB suspension include - but are not limited to:
 - 4.1.1 Failure to remediate when deactivated.
 - 4.1.2 Confirmed cases of VB unethical behavior (a minimum 12-month suspension applies for any unethical behavior) due to breach of the ethical principles outlined in the SLCP Code of Conduct and in the APSCA Code and Standards for Professional Conduct. Note that the suspension duration may vary at the scheme level in relation to APSCA suspension timelines.
 - 4.1.3 Failure to meet the CAP submission timeline and approval requirements as outlined in the QA Manual.

- 4.1.4 Failure to meet SLCP requirements about having a minimum of 1 CSCA as part of the verification team.
- 4.1.5 Failure to fulfill payment obligations of all SLCP-related fees (including the CAR/CAP fees) as outlined in the QA Manual section.
- 4.1.6 Suspension of APSCA membership status.
- 4.2 VBs are notified by the VOO prior to their suspension. If applicable, they will be informed of actions necessary to avoid suspension.
- 4.3 Suspensions occur as follows:
 - 4.3.1 VOO informs the VB about the suspension via email.
 - 4.3.2 Suspension takes place within 3 business days of the end of the VOO's investigation.
- 4.4 The profile of the suspended VB is deactivated on the Gateway and they are ineligible to perform SLCP activities for the defined suspension period. Any pending activities, including any verifications initiated prior to the suspension, are to be completed as planned by the VB to limit the impact on facilities.

5. Lifting VB Suspension

- 5.1 To qualify for reactivation after suspension, the following must be met:
 - 5.1.1 The VB shall obtain the original APSCA member status (or higher) prior to the VOO considering the VB for reactivation. For the VOO to consider the APSCA status valid, it must be listed on the [APSCA members' website](#).
 - 5.1.2 The applicable suspension period must have passed with no new instances of new ethics and/or quality breaches during the suspension period.
- 5.2 If the above conditions are met, the VB can be reactivated by following all required steps:
 - 5.2.1 Submit a written request for reactivation to the VOO.
 - 5.2.2 After approval by VOO, paying a fee (up to US\$1,000 – final fee based on hours accumulated for service) to cover the cost for VOO review of VB management system/ procedure improvements to address suspension issue/ type. Fee will not be returned if VB fails the reactivation review.
 - 5.2.3 Submitting to and passing the VOO review. Any VOO requests for updated information to be provided at the time of reactivation review.

6. VB Status: Terminated

- 6.1 Examples of scenarios leading to VB termination include but are not limited to:
 - 6.1.1 Repeat failure to improve the quality of assessment reports following the interventions outlined for Level 3 of the Integrity Oversight Program (see section 26).
 - 6.1.2 Repeat cases of VB unethical behavior (Reports of severe breach of ethics and/or integrity can also be reported outside of SLCP and need not be identified by the VOO to be considered grounds for termination.)
 - 6.1.3 Creation of a new VB entity with the same management and resource structure and failure to disclose this information at the time of application and thereafter would be subject to immediate termination.

Verifier Status & Eligibility

7. VB Responsibility

- 7.1 VBs shall ensure their Verifiers maintain SLCP Active status to perform SLCP activities.
- 7.2 VBs shall ensure that all active Verifiers maintain, at a minimum, ASCA status and that all ASCA Verifiers have clearly defined pathways to become CSCAs within the specified timelines.

8. Verifier Status: Active

- 8.1 After applying, paying the mandatory fee (See the [SLCP Helpdesk](#) for more details on the application fees) and receiving approval from VOO, Verifiers are granted Active status in the SLCP Gateway.
- 8.2 Only Verifiers with Active status and with ASCA/CSCA in Good Standing APSCA statuses are eligible to perform SLCP activities. Note that each verification is required to have a minimum of one CSCA as part of the verification team: only sending ASCA status Verifiers will be considered a non-compliance. See the [SLCP Helpdesk](#) for more details.

9. Maintaining Active Status

- 9.1 Verifiers shall maintain their “active” status annually and maintain their APSCA status of ASCA/CSCA- In Good standing to continue performing SLCP activities.
- 9.2 Status maintenance is achieved through:
 - 9.2.1 The completion of any SLCP required training courses (e.g., updated Verifier training).
 - 9.2.2 Annual completion of the renewal training on the Sumerra Training and Education Platform (STEP; <https://training.sumerra.com>) managed by the VOO.
 - 9.2.3 Completion of other continual professional development (CPD).
 - 9.2.4 Annual submission of a Verifier Status Maintenance (VSM) Worksheet for review and approval by the VOO. VSM worksheets are available on and submitted through the STEP platform.
- 9.3 The minimum requirements for continual professional development (CPD) are:
 - 9.3.1 Minimum of 16 hours of Social & Labor System Assessments (e.g., audits, verifications). This includes but is not limited to SLCP verifications, brand CoC audits, RBA/ICTI/WRAP, SA8000 audits, etc.
 - 9.3.2 Minimum of 16 hours of professional and knowledge practice. This includes:
 - 9.3.2.1 Specialized training on Relevant Subject Matter or Social Compliance (e.g., Forced Labor Awareness, Ethics, Fire Safety Training, Schemes, etc.)
 - 9.3.2.2 Attendance/Speaking at Relevant Industry Conferences
 - 9.3.2.3 Delivering External Training
 - 9.3.2.4 Volunteer Participation on Relevant Committee/Board
 - 9.3.2.5 Other Activities
- 9.4 Maintaining APSCA CSCA certification is considered equivalent to the professional development requirements listed under the minimum requirements above.
- 9.5 Verifiers have a 30-day grace period after the one-year anniversary of approval (giving them 12 to 13 months of total approval period).

10. Verifier Status: Deactivated

- 10.1 Any Verifiers due to suspension, separation from approved VB or termination are marked as “Deactivated” in the Gateway.
- 10.2 Candidates whose Verifier status has expired due to failure to complete Verifier Status Maintenance (VSM) requirements, including required ASCA or CSCA- In Good Standing APSCA status, SLCP training and VSM worksheet, will be deactivated.
 - 10.2.1 Candidates can reactivate their Verifier status after the expiration date by:
 - 10.2.1.1 Submitting reinstatement form to VOO (a link to the form is provided via suspension notification email or via request).
 - 10.2.1.2 Completing necessary SLCP training.
 - 10.2.1.3 Submitting VSM Worksheet covering the prior 12 months immediately preceding the reactivation request.
 - 10.2.1.4 Written confirmation from APSCA on the deactivated Verifier’s ASCA or CSCA status at the time of reinstatement.
 - 10.2.1.5 Reactivation is subject to automatic audit and verification of VSM-related material and payment of US\$200 reactivation fee plus any applicable annual/upcharge fees.

- 10.3 A deactivated Verifier is marked in the Gateway as Deactivated and is thus ineligible to perform any new SLCP verification. Any pending activities, including any verifications initiated prior to the deactivation, are to be completed to limit the impact on facilities.
- 10.4 Deactivation can result in reactivation after following and completing the required activities listed by the VOO. Timelines for reactivation will vary depending on the specific circumstances.

11. Verifier Status: Suspended

- 11.1 Example scenarios leading to Verifier suspension include but are not limited to:
 - 11.1.1 Confirmed cases of Verifier unethical behavior, except for Verifier's bribery.
 - 11.1.2 Repeat cases of suspected Verifier unethical behavior shared by stakeholders to SLCP via complaint forms and/or via emails.
 - 11.1.3 Evidence of repeat patterns of low-quality performance (e.g., more than 1 report invalidated within a 12-month period, lack of adhering to SLCP guidance shared during regional calibrations and via Technical Bulletins etc.).
- 11.2 Duration of Verifier suspension
 - 11.2.1 All Verifier unethical behavior cases, except Verifier bribery, result in a minimum 12-month suspension.
 - 11.2.2 The length of suspension for repeated low-quality performance may vary depending on the nature of the issue.
- 11.3 Verifiers are notified by the VOO prior to their suspension. If applicable, they will be informed of actions necessary to avoid suspension.
- 11.4 Suspensions occur as follows:
 - 11.4.1 VOO informs the VB that the Verifier shall be suspended.
 - 11.4.2 Suspension takes place within 3 business days of end of the VOO's investigation.
- 11.5 The profile of suspended Verifiers is deactivated on the Gateway and they are ineligible to perform SLCP activities for the defined suspension period. Any pending activities including any verifications initiated prior to the suspension are to be completed as planned by the VB to limit the impact for facilities.

12. Lifting Verifier Suspension

- 12.1 Verifiers that are suspended for unethical behavior and/or recurring patterns of low-quality performance may reapply to become Verifiers after the end of the suspension period and the VB that employs them can demonstrate they have taken sufficient measures to improve the Verifier's quality.
- 12.2 Verifier suspensions can be lifted after the applicable suspension period has passed by:
 - 12.2.1 Submitting a written request for re-application to the VOO.
 - 12.2.2 After approval by VOO, completing new Verifier application.
 - 12.2.3 Paying US\$200 re-activation fee (will not be returned if Verifier fails the exam).
 - 12.2.4 Retaking the exam.
 - 12.2.5 Paying any required annual fees.
 - 12.2.6 Confirmation from APSCA on the suspension Verifier's ASCA or CSCA status at the time of the re-application.

13. Verifier Status: Terminated

- 13.1 The VOO holds the right to terminate a Verifier, which means permanent removal from the Program without possible re-entry into SLCP due to repeat breach of SLCP Code of Conduct, the APSCA Code and Standards for Professional Conduct, the Quality Assurance procedures outlined in the QA Manual and the VB requirements outlined in this document that results in serious harm to the credibility of SLCP Program.
- 13.2 Examples of scenarios leading to Verifier termination include- but are not limited to:
 - 13.2.1 Confirmed cases of Verifier bribery
 - 13.2.2 Confirmed recurring cases of other type of Verifier unethical behavior

13.2.3 Revocation of APSCA membership status

Resource & Personnel Requirements

14. Roles and Responsibilities

- 14.1 VBs shall designate personnel as VB Administrators to ensure the smooth management of the SLCP Program and effective oversight of the quality of all SLCP assessment reports.
- 14.2 VBs shall ensure that all designated VB Administrators are registered through this [form](#)
- 14.3 Failure to designate and register all Key and Supporting VB Administrators will result in the temporary deactivation of the VB.
- 14.4 If there are any changes in VB Administrators, VBs are required to report these changes to the VOO via email within one week of the new appointment. Failure to notify the VOO of personnel changes will lead to temporary VB deactivation.
- 14.4.1 **Newly approved VBs** have one month to designate all Key and Supporting VB Administrators and register the staff through this form. Failure to designate and register all Key and Supporting VB Administrators will result in a temporary deactivation of the VB.
- 14.5 **Key VB Administrators'** roles are mandatory for all VBs. They serve as the primary points of contact for the SLCP Program within each VB. They are responsible for overseeing and leading the implementation and coordination of the SLCP Program. Their role ensures that the VB maintains full alignment with SLCP requirements and expectations.
- 14.5.1 Key VB Administrators are:
- Primary Scheme Manager
 - Primary Quality Manager
- 14.5.2 VBs shall ensure that the roles of Primary Scheme Manager and Primary Quality Manager are held by a separate individual; the same person is not allowed to hold both roles simultaneously.
- 14.5.2.1 The roles of Primary Scheme Manager and Primary Quality Manager may overlap with other roles, such as Verifiers and In-House Trainers, as long as this does not compromise their primary tasks and responsibilities. See the [SLCP Helpdesk](#) for more details.
- 14.5.3 Failure to align with the above requirements can lead to deactivation.
- 14.6 **Supporting VB Administrators'** roles is mandatory for all VBs. They assist in the day-to-day management and operational coordination of the SLCP Program within the VB. Supporting VB Administrators include:
- **Report Quality Reviewers**
 - **In-House Trainer**
 - **Schedulers**
- 14.6.1 Report Quality Reviewers, In-House Trainers and Schedulers can be assigned to Verifier personnel. However, the same person is 'not' allowed to be both the Verifier and Report Quality Reviewer for the same assessment reports (PRJ numbers).
- 14.7 **Country-specific VB Administrator roles are optional.** They facilitate the coordination and management of the SLCP Program across different regions and countries. Country-specific VB Administrators include Regional Scheme Managers, Regional Quality Managers, Regional schedulers, etc.
- 14.8 VBs shall register all VB Administrators -Key, Supporting and Country-specific, if any, with the VOO in a timely manner using this [form](#).

- 14.9 VBs shall notify any staff changes among the VB Administrator personnel (including any change among Verifiers) to the VOO in a timely matter using this form. See the [SLCP Helpdesk](#) for more details.
- 14.10 Failure to register all VB Administrators as per above guidance and to report staff changes may lead to deactivation.

14.11 Primary Scheme Manager

- 14.11.1 The Primary Scheme Manager is responsible for all the activities related to the organization and delivery of the SLCP Program globally.
- 14.11.2 The Primary Scheme Manager shall act as the single point of contact with the VOO to provide timely responses to inquiries related to all program management topics and inquiries globally.
- 14.11.3 The Primary Scheme Manager is responsible for managing all Verifier applications and supplemental application and their corresponding fee payment. See the [SLCP Helpdesk](#) for more details.
- 14.11.4 The Primary Scheme manager is responsible for managing parent VB responsibilities as it relates to the SLCP program requirements and for maintaining consistency globally (e.g., by cascading any information regarding SLCP requirements to all Verifiers in the approved regions through internal calibrations).
- 14.11.5 The Primary Scheme Manager- in close collaboration with the Primary Scheme Manager- is also responsible for setting up a scalable system to track and monitor the quality performance of all Verifiers globally and to ensure that all Verifiers are up to date with trainings, revisions to the CAF tool, updated program documentation, technical bulletins, including all other issued requirements via ad hoc Comms and other relevant program updates.
- 14.11.6 The Primary Scheme Manager shall join all SLCP VB General Calibrations and cascade all the information shared during the meeting with relevant personnel within the VB across different regions and countries (If necessary, to ensure that the information shared by SLCP is fully understood, Primary Scheme Managers are encouraged to translate the materials provided by SLCP into the local language).
- 14.11.7 The Primary Scheme Manager is also encouraged to attend all SLCP Regional VB Calibrations.
- 14.11.8 The Primary Scheme Manager shall be an employee and not a subcontractor and shall be fluent in English to facilitate timely resolution of identified gaps/issues and engagement with the VOO and SLCP teams.

14.12 Primary Quality Manager

- 14.12.1 The Primary Quality Manager is responsible for the verification report data and quality evaluation for all SLCP assessments conducted globally by the respective VB.
- 14.12.2 The Primary Quality Manager shall act as a point of contact with the VOO to provide timely responses to specific queries on the quality of SLCP verification reports.
- 14.12.3 The Primary Quality Manager is responsible for managing the performance of the internal quality teams globally and maintaining data consistency among different regions and countries.
- 14.12.4 The Primary Quality Manager supports the Primary Scheme Manager to maintain a scalable system to track and monitor the quality performance of all Verifiers globally and to ensure that all Verifiers are up to date with training, revisions to the CAF tool, updated program documentation, technical bulletins, including all other issued requirements via ad hoc communications and other relevant program updates.

- 14.12.5 The Primary Quality Manager shall review the VB dashboard on an ongoing basis to monitor VB and Verifier scores, monitor progress on issued corrective action requests (CARs), access quarterly and regional calibration webinar content, reference the knowledge base and review the bulletin board for updated technical guidance including all other issued requirements via ad hoc Comms.
- 14.12.6 The Primary Quality Manager shall join the relevant SLCP Regional Calibrations and cascade all the information regarding SLCP quality requirements shared during the meeting with relevant personnel within the VB across different regions and countries (e.g., through internal calibrations for all Verifiers, report reviewers and (if available) country-specific VB administrators (If necessary, to ensure that the information shared by SLCP is fully understood, Primary Quality Managers are encouraged to translate the materials provided by SLCP in local language).
- 14.12.7 The Primary Quality Manager is also encouraged to attend all SLCP General VB Calibrations to ensure a full understanding of all program and system updates.
- 14.12.8 The Primary Quality Manager is responsible to monitor and assess the effectiveness of the scheduling system deployed across the different regions and countries.
- 14.12.9 The Primary Quality Manager is responsible for setting up a scalable system to track and monitor the quality performance of all report quality reviewers over time. Failure to do so may result in a fee-based management systems CAR.
- 14.12.10 The Primary Quality Manager should be an employee and not a subcontractor and shall be fluent in English to facilitate timely resolution on identified gaps/issues and engagement with the VOO and SLCP teams.

14.13 Report Quality Reviewer

- 14.13.1 The Report Quality Reviewer is part of the internal quality team and actively participates in the required internal quality assurance reviews of all verified reports before they are finalized (see Section 25.1.1).
- 14.13.2 The Report Quality Reviewer shall be an employee and not a subcontractor and shall be fluent in English to facilitate resolution on identified gaps/issues and engagement with the VOO and SLCP teams
- 14.13.3 Report Quality Reviewers are encouraged to join SLCP's General and Regional calibration webinars to stay aligned on quality expectations and best practices.
- 14.13.4 The first initial and last name of the primary Report Quality Reviewer or quality assurance personnel in each assessment report.

14.14 In-House Trainer

- 14.14.1 This role has the responsibility to develop and deliver SLCP training (see Section 16).
- 14.14.2 The In-House trainer is responsible for tracking and ensuring that the Verifier trainings are up to date.

14.15 Scheduler

- 14.15.1 This role has the responsibility to support Verifiers in the planning and scheduling of verification activities. It also involves identifying and communicating system inefficiency to the Primary Quality Manager to prevent Verifiers' overcapacity, which can result in low quality and inconsistent data.

15. Competence

- 15.1 VBs shall maintain documented procedures in English, as well as in the local language, on how the SLCP competence requirements are assessed and met among Verifiers (see

the SLCP QA Manual for a complete list of SLCP Verifier Requirements). This documentation should be kept for a minimum period of 12 months or longer to support inquiries from VOO/SLCP. This documentation will be requested by the VOO during the VB Management Systems Check or can be requested at any time based on the identified gaps.

- 15.2 Competency requirements shall also cover all VB Administrators' roles (Key, Supporting and Country-specific- if available).
 - 15.2.1 All VB Administrators shall complete an equivalent of the 'Verifier Body Manager Course' provided by the [ITC](#).
 - 15.2.2 All VB Administrators shall conduct an in-depth review of all SLCP protocols and VB Requirements
 - 15.2.3 All VB Administrators shall stay up to date on key changes related to the SLCP Program, particularly all quality requirements. This includes-among others, reviewing all VB Technical Bulletins issued by SLCP/VOO, General, and Regional calibration materials. Failure to do so may result in deactivation.
 - 15.2.4 All VB Administrators shall have a strong understanding of how to access and use the individual VB dashboard to monitor and track the VB and Verifiers' quality performance.
 - 15.2.5 It is recommended that all VB Administrators have extensive knowledge and experience in social auditing, together with an in-depth knowledge of the relevant legal requirements for the supported countries and are responsible for ensuring consistency in knowledge for all approved Verifiers where they operate.

16. Training

- 16.1 VBs shall ensure that all Verifiers, including subcontracted Verifiers and temporarily suspended Verifiers, have the required knowledge and skills appropriate to conduct high-quality, reliable verifications in all approved countries, including supplemental approved countries.
- 16.2 VBs shall conduct training for all Verifiers, including initial SLCP-specific onboarding training and continuous training to ensure current country and legal knowledge and acceptable performance.
- 16.3 **Onboarding Training:** VBs shall ensure that all new Verifiers receive comprehensive onboarding training and highly encourage VBs to conduct shadow audits in the field prior to the first verification to assess Verifier competency.
- 16.4 **SLCP-specific Onboarding Training:** In addition to the global onboarding training, each VB shall conduct SLCP-specific onboarding training.
 - 16.4.1 VBs shall have procedures outlining how SLCP-specific onboarding training is conducted (e.g., materials and format used), the length and the scope of the training.
 - 16.4.2 SLCP- specific onboarding training-shall be provided to all new Verifiers, including all new subcontracted Verifiers.
 - 16.4.3 SLCP- specific onboarding training shall cover all SLCP Program requirements (e.g., introduction to the CAF, Gateway, etc.), including all quality requirements (e.g., introduction to the QA Manual, VB requirements, how to conduct an effective internal quality check, etc.)
 - 16.4.4 SLCP- specific onboarding training shall be provided in addition to the required SLCP Verifier Course and Holistic Data Triangulation Training by the VB.
 - 16.4.5 **On-site shadow:** As part of the onboarding, VBs may have 'Trainees' and 'Observers' who are employees of the VB attend the verification. VBs shall ensure:
 - 16.4.5.1 Facilities are aware of 'Trainees' or 'Observers' attending the verification.
 - 16.4.5.2 Verifiers clearly identify the 'Trainees' and 'Observers' to the facility at the time of verification.

16.4.5.3 'Trainees' or 'Observers' shall not be involved in any decision-making on the verification and/or conducting any assessment activities (e.g., worker and/or management interviews).

16.5 SLCP- specific Continuous Training VBs shall provide all Verifiers, including subcontracted Verifiers, with continuous training on SLCP.

16.5.1 Continuous training on SLCP should be provided every time there are significant changes to the SLCP system and to the quality requirements, but at a minimum, twice a year.

16.5.2 Continuous training on SLCP shall be linked to the outcomes of performance evaluation/monitoring of Verifiers. If quality gaps are identified, the VB shall support the Verifiers through ad-hoc training throughout the year and shall ensure the quality gaps are resolved before those same Verifiers are selected for new verifications.

16.6 VBs shall maintain records that show all Verifiers, including subcontracted Verifiers, have undergone onboarding and continuous training and that all training is effective.

16.7 SLCP does not define the length, format, and content for these trainings. However, it is highly recommended that General and Regional Calibration webinars be used as part of SLCP-specific continuous training for all Verifiers at a minimum. This may include attending the entire live session or viewing the recording of the quarterly calibration webinars, in their entirety, through the [Sumerra Training and Education Platform \(STEP\)](#), managed by the VOO.

17. Calibration

17.1 VBs shall have methods to ensure the consistency of SLCP verification outcomes among Verifiers and Report Quality Reviewers.

17.2 Calibrations ensure verifications and data quality review are conducted consistently. Performance monitoring activities should be used to identify where additional calibration is needed.

17.3 VBs shall maintain documented procedures on how internal calibration is conducted and how the related performance effectiveness is measured; this documentation will be requested by the VOO during the VB Management Systems Check or can be requested at any time based on the identified training and quality gaps.

17.4 Continuous training and measurable performance monitoring can be used to meet this requirement if VBs can demonstrate how the outcomes of these activities are used to calibrate with all approved Verifiers.

17.5 VB General Calibrations

17.5.1 VB general calibrations are quarterly trainings, each lasting about 1.5h, hosted online by SLCP and developed with support from the VOO.

17.5.2 VB general calibrations aim to enhance VBs' understanding of the SLCP DQI process and procedures, while addressing current SLCP DQI challenges.

17.5.3 VB general calibrations are mandatory for the Primary Scheme Managers and optional for all Primary Quality Managers of all SLCP-approved VBs.

17.5.4 VBs that cannot attend the VB general calibrations live shall download the recordings within two weeks from the date of the recordings' availability. Recordings are made available to all VBs after the live session and a notification is sent by the VOO.

17.5.5 Failure to attend/view the Calibration Webinars is grounds for deactivation.

17.5.6 VOO will reactivate the VB after the VB completes the requirement.

17.5.7 Primary Scheme Managers VBs are highly encouraged to use the materials of the VB General calibrations as part of the Verifiers and VB Administrators' continuous training on SLCP.

17.6 VB Regional Calibrations

- 17.6.1 Regional Calibrations are country-specific, offline, self-paced calibration sessions. By the end of Q1 each year, SLCP shares the list of selected countries and tentative dates with all the VBs.
- 17.6.2 **Mandatory for VBs in scope:** Regional calibrations are mandatory for all approved and active VBs that have conducted at least one verification in the selected countries within the past 24 months.
- 17.6.3 **Optional for VBs not in scope:** All other VBs are encouraged to check and cascade the materials of the regional calibrations as part of their ongoing update on SLCP DQI requirements.
- 17.6.4 The regional calibrations are held offline. The presentation deck is made available on the VB Dashboard and SLCP will notify all VBs when the deck is available, specifying whether the Regional calibration is mandatory or “optional.
- 17.6.5 Upon notification, the Primary Quality Manager has four weeks to download the deck, review it carefully, take and pass the quiz (included in the presentation deck).
- 17.6.6 Primary Quality Manager shall attain a minimum pass score of 80% within four weeks from the date the deck is made available on the VB Dashboard. The exact pass score will be displayed in the VB Dashboard (Regional calibration quiz scores are intended solely for learning purposes and do not impact the Verifier Body (VB) score in any way).
- 17.6.7 VBs who do not take the quiz within the four-week period and/or do not obtain the minimum 80% pass score will not be considered as having attended and may be subject to deactivation.
- 17.6.8 VBs that do not attain a pass score of minimum 80% will be contacted by the SLCP DQI team to discuss the next steps.

17.7 VB In-person Forum

- 17.7.1 VB in-person Forums are an annual event for all approved VBs. SLCP will notify the VBs in a timely manner every year regarding the details of the event.

17.8 Knowledgebase: SLCP maintains a [Knowledgebase](#) of questions that were asked during the general and regional calibrations, with the answers provided by SLCP.

- 17.8.1 VBs are highly encouraged to use the content available in the Knowledgebase as materials during continuous training for Verifiers and VB Administrators on SLCP.

18. Knowledge of SLCP Subject Areas

- 18.1 VBs shall make available to all Verifiers up-to-date, appropriate resources on labor and health and safety laws, including any changes in regulations for all approved countries.
- 18.2 Verifiers shall be able to access- and fully understand- this information before, during and after a verification for accurate representation of the data in the final verification reports.

19. Freelance Verifiers

- 19.1 SLCP prohibits the use of ‘freelance’ Verifiers for any SLCP verifications. “Freelance’ means the Verifier is not a direct employee of the VB and is free to work as a contractor conducting SLCP verifications for any company that wishes to hire them.
- 19.2 VBs shall not hire any ‘freelance’ Verifiers to conduct SLCP verifications.

20. Subcontracted Verifiers

- 20.1 Use of part-time or subcontracted Verifiers is permitted ONLY if the Verifier works on a subcontracted/part-time basis exclusively for one VB for the purpose of SLCP Verifications (a Verifier can still conduct other scheme assessments for multiple companies).
- 20.2 If using part-time or subcontracted Verifiers, the VB shall exercise and enforce the same management systems criteria as when utilizing full time employees.
 - 20.2.1 The VB's SLCP policies and procedures on Verifier qualifications, internal training (including SLCP-specific onboarding and continuous training), performance monitoring, calibration and ethics/integrity shall be applied to part-time and subcontracted Verifiers.
 - 20.2.2 Any part-time/subcontracted Verifier shall also be documented to be covered by the VB's Professional Liability Insurance coverage; and/or Indemnification; the SLCP Verifier Body Agreement; and any applicable SLCP Terms of Use.
- 20.3 VBs shall maintain documentation that demonstrates how any subcontracted/part-time Verifiers meet these requirements. This documentation may include subcontracting agreements; internal training logs for part-time/subcontracted Verifiers; affidavits/documentation from insurer indicating coverage of such Verifiers; Performance Monitoring results for part-time/subcontracted Verifiers.
 - 20.3.1 VBs shall produce documentation upon request of VOO.

Changes to VB Staffing

21. Informing the VOO of Staff Changes

- 21.1 If a Verifier, including subcontracted Verifiers, ceases to be employed by a VB, the VB shall inform the VOO immediately. VBs can inform the VOO by emailing SLCP@sumerra.com. Failure to do so will lead to temporary deactivation.
- 21.2 If a Verifier leaves the Verifier Body prior to the invoice being issued, SLCP will waive the Verifier Access fee if a) they have not yet conducted any verifications and b) the VB informs the VOO immediately of their departure.
- 21.3 All new and existing ASCA and CSCA status Verifiers are to list SLCP in the APSCA profile as a scheme participant; failure to do so may result in temporary deactivation.
- 21.4 To link SLCP as a Collaborative program, please follow this [linked guideline](#) from APSCA on *How To Add A Collaborative Program / Scheme Accreditation To Your APSCA Profile*.
- 21.5 VBs shall inform the VOO of any 'downgrades' of APSCA status of Verifiers associated with the VB. For example, if a CSCA is downgraded to ASCA membership or if the ASCA status Verifiers no longer have status in good standing, including if membership is revoked or suspended for any reason.
- 21.6 If the Primary Scheme Manager or Primary Quality Manager ceases to be employed by a VB, the VB shall notify SLCP immediately. VBs shall fill those roles within 60 days to prevent any negative impact on the overall management of the SLCP Program. See the [SLCP Helpdesk](#) for more details.
- 21.7 Failure to inform VOO of any staff changes (staff leaving or new staff registration) can lead to temporary deactivation.

22. Transfer of SLCP Verifier Approvals

- 22.1 VBs that add an existing Verifier with a minimum of ASCA and or CSCA, APSCA status to their employment can maintain their approval status.
- 22.2 Status as an SLCP approved Verifier is transferable only between approved "active" full member APSCA member VBs.
 - 22.2.1 Before transferring to a new active VB, Verifiers are required to complete all pending SLCP activities they have already been assigned (verifications started and in VRP status and beyond). Pending activities include conducting the verification and writing the report, sharing any internal notes, unsubstantiated and/or sensitive issues that may not have been included in the final report,

photos, attachments, and sharing any other relevant verification-related information with the VB's Scheme Manager before applying for a transfer to another VB.

- 22.2.2 Verifier Bodies are obligated to ensure this requirement is included in their management system and communicated to all their approved Verifiers. It is also the VB's responsibility to ensure that all pending post-onsite activities are closed out in a timely manner.
- 22.3 Reapplication is not required if a Verifier transfers from one approved full APSCA member VB to another unless the VSM has expired, in which case, the reinstatement process will need to be followed.
- 22.4 VBs to note that a Verifier who transfers to their VB will not be able to maintain countries on the Verifier's approved list unless the VB also has approval for those countries. In scenarios where there is a country mismatch, the unapproved countries will be removed from the Verifier's approved list. Verifiers will be eligible to add back the mismatched countries after the VB has submitted new application and received approval for the countries.
- 22.5 To transfer her/his approval status, the Verifier or VB shall complete [this form](#).

Use of Translators

23. Translator Qualifications

- 23.1 VBs shall have a procedure for vetting translators to ensure they are trained in and understand social compliance topics.
- 23.2 VB shall ensure that translators understand and abide by the VB's internal Code of Conduct, confidentiality requirements, all applicable terms of the SLCP Code of Conduct, and requirements under SLCP Professional Conduct, contained in the [Verification Protocol](#) Annex.
- 23.3 VBs shall not utilize workers and/or any other facility representatives at the verification facilities to serve as translators during worker interviews in any capacity; VBs are responsible for ensuring that translators are vetted and designated prior to the onsite verifications.
- 23.4 VBs shall identify qualified translators in advance of the verifications and failure to deploy translators where Verifier(s) do not have sufficient language proficiency (reading and speaking), may result in a fee-based CAR issuance.
- 23.5 Verifier shall include the presence of any translators during the onsite verification under VD-VERI-11 ('*Were any interpreters present during verification/assessment?*') in the verification details section of the VRF report. If yes, Verifier shall include the Identification details (First and Last Name and Organization) of all parties present for verification/assessment activity under VD-VERI-12 in the same verification details section of the report.

Performance Monitoring

24. SLCP Performance Monitoring and Scoring

- 24.1 The VB Quality Score (VBQS) and the Verifier Quality Score (VEQS) are the two metrics used by the VOO to monitor, track and communicate the quality performance of VBs and Verifiers. See the SLCP QA Manual for details on Verifier (Section 3.9) and VB scoring (Section 3.13).
- 24.2 The VB Quality Score comprises of three scoring elements:
 - 24.2.1 **VB Management System Check Score** is a score assigned to VBs after the VOO conducts the management system check (every 3 years or less based on VOO discretion)- to assess whether the management system in place is aligned

with SLCP requirements.

24.2.2 **Verifier Quality Score - Weighted Average** is the weighted average of each Individual Verifier Quality Scores proportional to their verification activity.

24.2.3 **Verifier Body Issue to Verification Ratio** is calculated by dividing the number of quality issues associated with the VB by the total number of verifications that VB has conducted.

24.3 **The Verifier Quality Score** is the score assigned to each individual Verifier and it reflects how many quality issue mistakes that individual Verifiers are making. It is based solely on the Verifier issue/verification ratio, *calculated as the number of quality issues associated with a Verifier's assessment divided by the total number of verifications conducted in the past 12 months.*

24.4 The VB and Verifier scores range from 0-5, 5 being the highest achievable score.

24.5 Applicable scoring of VBs and their Verifiers is shared with VBs via the VB Dashboard managed by the VOO. VB administrators are to share the scores and changes in the scores with their Verifiers to ensure they are made aware of their ongoing performance.

24.6 Average VB and Verifier scores are publicly shared via the [SLCP Public QA Dashboard](#).

25. VB Monitoring Performance of its Verifiers

25.1 VBs shall have documented procedures for monitoring Verifier performance in English and other applicable languages. This documentation will be requested by the VOO during the VB Management Systems Check or can be requested at any time based on the identified gaps.

25.1.1 VBs shall conduct an internal quality review of 100% of SLCP reports, including but not limited to checking applicable dates, CAF question selections, use of legal flags, narratives on mandatory questions, etc., before the verification is completed and passed on to the facility for review. See the Report Reviewer requirements outlined in section 14.10.

25.1.1.1 SLCP's Verifier Guidance can be referenced for quality review activity.

25.2 SLCP Verifier scoring shall be considered in performance monitoring; Verifier quality scores can be reviewed by the VB administrators via the VB dashboard.

25.3 VBs shall clearly define the actions they take when Verifier performance and/or SLCP Verifier scoring is less than acceptable, including development and implementation of corrective actions.

25.3.1 At minimum, VBs shall require ongoing training AND shadow the Verifiers, if performance is less than acceptable with a measurable plan to address the quality gaps. Shadow audits for other programs/schemes may be used for this purpose to assess the Verifier's required skills and knowledge.

25.4 Global procedures for performance monitoring covering multiple schemes may be used, but VBs shall be able to demonstrate how SLCP program requirements are covered in the VB led shadow verification.

26. Integrity Oversight Program

26.1 VB performance scoring affects VB's status in SLCP.

26.2 Based on the VB score a corresponding risk level is determined:

26.2.1 Level 0 -lowest risk

26.2.2 Level 1

26.2.3 Level 2

26.2.4 Level 3- highest risk

26.3 Each risk levels result in specific interventions to incentivize VBs to improve their performance.

26.4 Once a Verification Body (VB) begins interventions at a specific performance level, they shall complete the full process for that level, regardless of any score improvements during the intervention period. For example, if a VB enters Level 2 and a Corrective

Action Request (CAR) has been issued, they must complete all Level 2 interventions, even if their score later improves enough to qualify for Level 1. The level assignment is locked once interventions begin and does not change based on updated scores during the intervention period.

VB risk levels and related interventions

Level 0 – VB score is 4 or greater than 4

26.5 VBs who fall into Level 0 shall remain at this level for 60 consecutive days to be considered L0. All VBs in Level 0 shall:

26.5.1 Continue to maintain their high score by tracking Verifiers performance and providing support when needed.

26.6 Level 1- VB score is 3 or greater than 3 but less than 4

26.6.1 VBs who fall into Level 0 shall remain at this level for 60 consecutive days to be considered L0. All VBs in Level 1 shall:

26.6.2 Review the monthly reminders sent by the VOO to check the VB Dashboard and the CAP Management Portal.

26.6.3 Encourage access to industry-specific training and professional development opportunities, and SLCP-specific training among Verifiers across different regions.

26.7 Level 2- VB score is 2 or higher but less than 3

26.7.1 VBs who fall into Level 2 shall remain at this level for 45 consecutive days to be considered L2.

26.7.2 SLCP will start monitoring VBs as soon as they move into the Level 2 category on SLCP's internal dashboard (meaning day 1-45 of being in status Level 2). SLCP will use predictive and descriptive analytics outcomes related to that VB and its Verifiers to decide whether to conduct risk-based Desktop Reviews at this early stage, before day 46 (VBs will not be charged for Desktop Review at this stage).

26.7.3 From day 46 onwards, VOO will issue a fee-based management system CAR and send an issue summary report with a link to the dashboard to all VBs at this level. SLCP will issue the invoice for the related CAR and notify the VB via the CAP Portal.

26.7.4 After receiving the notification regarding the fee-based management system, CAR VBs shall:

26.7.4.1 Proceed to the payment of the invoice related to the CAR issued and sent by SLCP, within 30 days.

26.7.4.2 Submit the Corrective Action Plan (CAP) within the first 30 days or sooner. Evidence of the implementation must be submitted within 90 days from the CAR issuance date. See [SLCP Helpdesk](#) for details of the new fee-based model, including CAR type, CAP implementation windows and CAP Portal.

26.7.5 If the CAP submission and implementation timelines and/or CAP evidence do not meet the approval requirements, the VB will be suspended and during this period, the VB cannot conduct new verifications.

26.7.5.1 During this **suspension period**, the VB will work to complete CAP submission requirements and/or will work with the VOO to improve the CAP and will present additional implementation evidence as required by the VOO.

26.7.5.2 Once acceptable CAP and evidence are provided, the VB can resume Verifications, but it will remain under closer monitoring by the VOO.

26.7.6 During this **monitoring period**, VOO will choose 3 verifications among the ones

conducted within the first 20 verifications from the CAP closure period for Mandatory Desktop Reviews. The 20 Verification threshold is a maximum, not a minimum. VBs do not need to complete all 20 Verifications before the Mandatory Desktop Review selections can start. Additionally, the VOO may also use additional QA activities to evaluate the CAP implementation. Additional QA activities may include, but are not limited to: Shadow Verifications, Counter Verifications, Duplicate Verifications, limited VB management systems check. VBs will be responsible for covering the cost of any additional QA activities during this monitoring period.

26.7.6.1 These 3 Mandatory Desktop Reviews will be scored using the existing rating system (e.g., High, Good, Acceptable, etc.), and the VB will cover the costs of these reviews and any necessary further reviews.

26.7.6.2 **If the VB meets the rating requirement** of a minimum of one Acceptable and two Good or Very Good scored Mandatory Desktop Reviews, the “monitoring period” will be over.

26.7.6.3 **If the VB does not meet the rating requirement** of a minimum of one Acceptable and two Good or Very Good scored Mandatory Desktop Reviews, the **monitoring period will be extended**, and the VOO will conduct two additional Mandatory Desktop Reviews.

26.7.6.3.1 If the VB does not meet the rating requirement of a minimum of one Acceptable and one Good or Very Good scored Mandatory Desktop Review, the VB will continue to be placed in the ‘monitoring period’ for an additional 20 new verifications and undergo additional QA activities.

26.7.6.3.2 Additional QA activities may include Shadow Verifications, Counter Verifications, and Desktop Reviews that may result in Repeat and Double Repeat CARs and potentially push the VB scoring to Level 3. VBs will be responsible for covering the cost of any additional QA activities during this monitoring period.

26.7.6.3.3 After the ‘monitoring period’ of the additional 20 verifications, if the VB has naturally remained in Level 2 or risen to Level 1 or 0, the VB will be able to freely conduct verifications and regular QA (only CARs at VB cost, no longer the QA activities) will resume. If the VB has not improved, it will be moved into Level 3.

26.8 Level 3- VB score is less than 2

26.8.1 VBs who fall into Level 3 shall remain at this level for 45 consecutive days to be considered L3.

26.8.2 SLCP will start monitoring VBs as soon as they move into the Level 3 category on SLCP’s internal dashboard (meaning day 1-45 of being in status Level 3). SLCP will use predictive and descriptive analytics outcomes related to that VB and its Verifiers to decide whether to conduct risk-based Desktop Reviews at this early stage, before day 46. VBs will not be charged for Desktop Reviews at this stage.

26.9 From day 46 onwards, the VB will receive an updated issue summary report with a link to the dashboard. The report will include:

26.9.1 A summary of the Issues at an overall level to highlight areas of concern (e.g., total number of legal flags, total number of incorrect Verifier responses), with a link to the VB’s dashboard to proactively review all their CARs.

26.9.2 Data-driven trends, such as the 3 lowest-scoring Verifiers, country-level performance (if possible), and comparison of VE/VB accuracy rates to the average.

26.10 VOO will conduct a detailed VB management systems check, including document review and interviews. The VB is required to review the management system CAP that

was submitted during Level 2 and must determine why the CAP failed as preparation for the VB check. The VB will be required to cover the cost of the management system check.

- 26.11 The VB can continue conducting verifications during the management systems check.
- 26.12 Upon completion of the VB check the VB will be required to complete the related CAR/CAP
- 26.13 The VB has 30 days to submit and implement the CAP, starting from the CAR issuance date. The CAP must be submitted within 10 days from the CAR issuance date (VBs may decide to submit it sooner). The implementation evidence must be submitted within 30 days from the CAR issuance date.
- 26.14 VOO will review the CAP and related evidence to check if the VB has addressed the Issues.
- 26.15 If the CAP submission and implementation timelines and/or CAP evidence do not meet the approval requirements, the VB will be suspended and during this period, the VB cannot conduct new verifications.
- 26.16 During this suspension period, the VB will work to complete CAP submission requirements and/or work with the VOO to improve the CAP and will present additional implementation evidence as required by the VOO.
- 26.17 The VB can resume verifications under a probation period once acceptable CAP and evidence are provided. The VB may only conduct 3 verifications during this probation period.
- 26.18 Once the CAP is approved and acceptable evidence is provided, the VB will enter the **probation period**.
 - 26.18.1 During this period, the VB can only continue to conduct 3 verifications. VOO will review these 3 verification reports. These Mandatory Desktop Reviews will be scored using the existing rating system (e.g., High, Good, Acceptable, etc.), and the VB will cover the costs of these reviews. During this period, the VOO can conduct additional QA activities that may include but are not limited to Shadow Verifications, Counter Verifications, Duplicate Verifications, or limited VB management systems checks. VBs will be responsible for covering the cost of any additional QA activities during this monitoring period.
 - 26.18.2 If the VB meets the rating requirement of no more than one Acceptable and two Good or Very Good scored Mandatory Desktop Reviews, the probation period will be lifted, and the VB will be able to freely conduct verifications.
- 26.19 If the VB does not meet the rating requirement of Mandatory Desktop Reviews as outlined above, the probation period will be extended to allow the VB to conduct 2 more verification only, and the VOO will conduct Mandatory Desktop Reviews on these 2 additional verifications.
 - 26.19.1 If the VB meets the rating requirement of a maximum one Acceptable and one Good or Very Good scored Desktop Review, the probation period will be over, and the VB will be able to freely conduct verifications.
 - 26.19.2 Failure to pass the probation review results will result in termination of the VB approval and removal from the SLCP Active List.

27. Corrective Action Requests

- 27.1 Corrective Action Requests (CARs) are generated through multiple sources of Quality Assurance activities, such as but not limited to:
- 27.2 Outcomes of risk-based Desktop Reviews based on:
 - 27.2.1 Complaints on VRF reports (VRF status) submitted by SLCP report recipients.
 - 27.2.2 Flagged reports identified through SLCP analytics models.
 - 27.2.3 Confidential Sensitive Information Reports.
 - 27.2.4 NGO and/or other third-party-led investigations.
- 27.3 Outcomes of on-site QA activities (Counter, Duplicate and Shadow Verifications).

- 27.4 Outcomes of APSCA ethical investigations resulting in the suspension and/or revocation of VB/Verifier APSCA membership.
- 27.5 VOO led quality and/or ethical investigation resulting in substantiated outcomes.
- 27.6 CARs are issued by the VOO each time a Key Quality Issue Category (KQIC) is identified and grouped by the KQIC type at the QA event level (*Example: if there are 10 KQICs that are identified within a desktop review but out of those 10, if 5 are the same KQIC type that would be considered 1 CAR and if the other 5 have unique KQIC types, those would be 5 separate CARs, for a total of 6 CARs.*)
- 27.7 KQIC refers to errors, inconsistencies, deviations in assessment reports and/or gaps in the management systems that are identified through various QA activities conducted by SLCP and VOO or by external sources (e.g., APSCA investigations). See the [SLCP Helpdesk](#) for more details.
- 27.8 Each time a CAR is issued, the VOO notifies the VB Scheme Manager and Quality Manager via the CAP Portal.
- 27.9 There are three types of CARs that require CAPs and one Interim Alert that does not require a CAP:
- 27.9.1 Initial CAR: issued whenever specific key quality issues (KQICs) are identified for the first time.
 - 27.9.2 Interim Alert: issued when key quality issues are found while the VB is actively addressing the same quality issue in a current CAP within a 70-day time period (of the Initial CAR).
 - 27.9.3 Repeat CAR: issued if the same KQIC is identified after the 70-day Initial CAR implementation window and the VRF date is also beyond this window.
 - 27.9.4 Double Repeat CAR: issued if the same KQIC is found again on or after the 31-day implementation window of a Repeat CAR, and the VRF report is also dated on or after this window.
- 27.10 Initial, Repeat and Double Repeat CARs are fee-based with fees subject to adjustments at SLCP discretion.
- 27.11 Each time a fee-based CAR is issued, VBs shall proceed to pay the associated fee within 30 days from the invoice receipt date. When multiple CARs are generated from the same source event, the VB will only be charged one fee that is determined by the most severe CAR type identified from that source. It may still be possible to get multiple CARs that require CAP submissions from one source.
- 27.12 After the 12-month period, the Initial CAR and any Alerts or other CAR types will be rolled off. If there is a new instance of the same KQIC identified after the first Initial CAR is rolled off (after 12 months), then the process will restart with a new Initial CAR being issued, and a new 12-month period will restart.
- 27.13 VB shall promptly respond to SLCP/VOO's request for any clarification or evidence required to make a determination on the issuance of CAR. Failure to respond to VOO communication promptly can lead to deactivation.

28. Corrective Action Plans

- 28.1 VBs shall submit their Corrective Action Plan (CAP) to the VOO through the CAP portal
- 28.1.1 The CAP portal allows the VB to enter updates about their CAP, add additional comments, submit and notify the VOO, and view all CAPs associated with their VBs. The CAP Portal is accessible via the VB Dashboard. See the [SLCP Helpdesk](#) for more details.
- 28.2 Minimally, a CAP shall include the following fields:
- 1. Containment Action (as applicable)
 - 2. Root Cause Analysis Findings,
 - 3. Action Plan,
 - 4. Timeframes,
 - 5. Responsible Person(s),
 - 6. Criteria for Measuring Success, and
 - 7. Current Status

28.3 VBs shall submit and provide evidence of CAP implementation within the implementation window, which differs for each CAR type. The following implementation windows apply to the different CAR types:

28.3.1.1 Initial CAR has a 70-day implementation window from the date when the CAR is issued

28.3.1.2 Repeat CAR has a 30-day implementation window from the date when the CAR is issued.

28.3.1.3 Double Repeat CAR has a 15-day implementation window from the date when the CAR is issued.

28.4 The CAP is generally reviewed and approved by the VOO within 7-21 days of receipt if all information required for the CAP is submitted by the VB. In cases, where the CAP is not approved due to missing information and/or insufficient corrective action plan, the VOO will extend the review period to allow the VB to improve the CAP submission. It is the VB's responsibility to identify the root cause issues, develop an action plan and outline the criteria for measuring success and other elements outlined in the CAP.

28.5 If the CAP is not approved by the VOO, the VB shall develop an improved CAP.

28.6 Based on the submittal of adequate evidence, the VOO may either:

28.6.1.1 Close the issue: This means the evidence was sufficient to indicate the criteria for remediation were met.

28.6.1.2 Ask for additional evidence and/or edits to the CAP.

29. Shadow Verification by Interested Stakeholders

General Process

29.1 Interested stakeholders- such as brands, buyers, agents and representatives from compliance/accreditation schemes- can shadow an SLCP verification as "observers".

29.2 Interested stakeholders must identify the facility for the Shadow Verification,

29.3 reach out and inform the facility about their plans to conduct a Shadow Verification.

29.4 Interested stakeholders submit the [Shadow/Observation Request Form](#) to request facilities' approval and inform the VOO.

29.5 Prior to going on-site, interested stakeholders shall review the SLCP Verification Protocol and ensure they understand the applicable requirements.

29.6 Upon the facility's approval, interested stakeholders can conduct the Shadow Verification and- while onsite, fill in the Shadow Observation Report. See the [SLCP Helpdesk](#) for more details.

29.7 Interested stakeholders shall share the Shadow Observation Report with SLCP and- if needed- schedule a joint call to analyze the results and share feedback.

Procedures for Shadow Verification

29.8 The VB shall have policies and procedures around observation to ensure the observation does not impact the outcomes of the verification. The policies and procedures shall address at a minimum:

29.8.1.1 The observer may not interfere with the verification in any way.

29.8.1.2 The observer shall not actively participate in any of the verification-related activities.

29.8.1.3 The observer shall not provide guidance or recommendations to the Verifier or facility.

29.8.1.4 The observer shall not ask the facility questions about their compliance with standards (e.g., the brand's Code of Conduct/requirements).

29.8.1.5 The observer shall not interpret questions in the SLCP Data Collection Tool.

29.8.1.6 The observer shall not ask the facility questions about their self-assessment data.

- 29.8.1.7 The observer is permitted to observe only one group interview during the observation, with the prior consent of all workers. Observers shall include a note about the given consent in the Shadow Verification Report Form, which is shared by SLCP with the Observer prior to the verification.
- 29.9 VBs shall communicate these policies and procedures to observers in advance of the observation.
- 29.10 VBs shall work to ensure that the presence of observers during the verification does not impact the impartiality of the verification. Observers should look for any indication that their presence is having an impact, such as the facility trying to persuade a Verifier to enter specific data. If at any time the Verifier feels the presence of the observer is impeding their ability to conduct an impartial verification, the Verifier may ask the observer to leave.
- 29.11 Quality Reviewers shall ensure that Verifiers include the presence of any observers during the onsite verification under VD-VERI-12 (*'Identification details (First and Last Name and Organization) of all parties present for verification/assessment activity'*) in the verification details section of the VRF report.

Ethics and Integrity

30. Ethics and Integrity Procedures

- 30.1 VBs shall have a professional Code of Conduct that covers ethics, integrity, and impartiality for all Verifiers, including subcontracted Verifiers and VB Administrators, including verification sales, marketing and verification scheduling teams.
- 30.2 Verifiers and VB Administrators shall receive and understand the Code of Conduct.
- 30.3 VBs shall provide annual and ongoing training on ethics and integrity for all VB staff who support the SLCP program.
- 30.4 VBs shall have procedures that address:
 - 30.4.1 How Verifiers can raise concerns about ethical issues, including when a facility and/or facility representatives offer a bribe or act unethically.
 - 30.4.2 How facilities can report on instances where Verifiers and/or other VB representatives may solicit or accept bribes or act unethically.
 - 30.4.3 Improper use of Verifier credentials and misrepresentation of roles with all program stakeholders, including facilities.

31. Impartiality

- 31.1 The VB shall have a policy that it understands the importance of impartiality in carrying out its all-verification-related activities, including sales, marketing and verification scheduling teams, manages conflict of interest and ensures the objectivity of its verifications.
- 31.2 VBs shall undertake regular assessments of threats to impartiality and of the conflicts of interest that arise when providing SLCP services. Conflicts of interest can arise from a VB's relationship with its clients and unrelated bodies (i.e., self/joint assessment service providers) or from its relationship with related bodies. If in doubt, contact SLCP and VOO for clarifications before undertaking the verification work.
 - 31.2.1 For each SLCP verification a VB undertakes, they shall ensure there are no conflicts of interest that arise from a past or present relationship between the facility and the Verifier(s) and/or VB.
- 31.3 The VB shall document all possible conflicts of interest that relate to provision of SLCP services and make this documentation available to SLCP and/or the VOO
- 31.4 VBs shall be able to demonstrate how they eliminate or control any threats to impartiality or conflicts of interest.
- 31.5 Notwithstanding any internal prohibitions based on risk assessment and policies that may be stricter, if a Verifier engages in consulting work (including but not limited to

advisory, training services, support during self/joint assessment) at a facility, they are prohibited from conducting verifications at that facility for a period of 2 years.

Provision of External SLCP Training

32. Facility Training

- 32.1 VBs may not provide external training to facilities on SLCP unless they are a Training Body (TBs) for SLCP.
- 32.2 VBs that wish to provide external training to facilities should contact SLCP for a Training Body application.
- 32.3 Suspended VBs that are also TBs will be suspended from both roles simultaneously after the investigation has been substantiated.
- 32.4 VBs to ensure that the individuals providing the training to facilities are not the same Verifiers conducting the onsite and/or virtual verifications.

33. Other External Trainings

- 33.1 If VBs provide external training on SLCP to Verifiers, brands and other stakeholders that are not facilities, they shall ensure the information on SLCP is accurate and up to date.

Payment of SLCP Fees

34. VB Fees

- 34.1 By signing the SLCP Verifier Body Agreement, VBs commit to paying all applicable fees (e.g., Application fees, CAR/CAP fees, etc.)
- 34.2 As noted in the Agreement, failure to comply with the commitments can result in immediate termination of the VB approval.
- 34.3 Current SLCP fees are maintained on the [SLCP Helpdesk](#). Any fees related to Quality Assurance and Verification Oversight are either mentioned here or in the QA Manual.
- 34.4 Payment terms for all SLCP invoices are net 30 days.
- 34.5 Invoices for fees are usually issued by SLCP to the VB head office (the main point of contact for the SLCP program).

35. Penalties for Non-Payment

- 35.1 SLCP will issue payment reminders for all invoices not settled within 30 days. SLCP will inform the Verification Oversight Organization (VOO) if a VB fails to pay their invoice on time and will continue to update the VOO until payment is received. The VOO monitors non-payment of fees and implements the following penalties:
 - 35.1.1 Invoice unpaid after 90 days: the VOO issues the VB a warning that failure to pay will result in deactivation of the VB.
 - 35.1.2 Invoice unpaid after 120 days: the VOO informs the VB that they have been deactivated. At this time, the VB can complete already assigned verifications but will not be permitted to be selected for new verifications.
 - 35.1.3 Invoice unpaid after 150 days: the VOO informs the VB that they are suspended for a period of 12 months.
 - 35.1.4 Repeat late payment of fees: VBs that consistently pay SLCP invoices late (if two or more invoices are not paid within 60 days) are subject to a warning and at risk of termination if further invoices are not paid on time.

Annex 1.: Flowcharts of Integrity Oversight Program





