

# **Social and Labor Convergence Program (SLCP) Verifier Guidance Version 1.7\***

**10 April 2026**

This Verifier Guidance applies to Versions 1.7.0 and 1.7.1 of the Converged Assessment Framework. This document provides the Verifier with additional Guidance alongside the Verification Protocol to successfully complete an SLCP verification and report.

**This is a comprehensive document, and it is important that it is read thoroughly.**

**Disclaimer:** This file represents only one aspect of the [SLCP Converged Assessment Framework \(CAF\)](#).

The file should be viewed in conjunction with the other elements of the CAF relevant for Verifiers and Verifier Bodies: [Data Collection Tool](#) and [Worker Engagement Question Set, Verification Protocol](#), as well as the [QA Manual](#).

\*Verifier Guidance for CAF v1.7.0 and 1.7.1

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## 1. Introduction

This section explains how to use the Verifier Guidance and how it relates to the SLCP [Verification Protocol](#). The Verification Protocol is the single source of all mandatory requirements. [The Verifier Guidance](#) exists only where the Protocol:

- Explicitly refers to “Verifier Guidance” or
- Is difficult to apply consistently without practical clarification.

**This section must be read before using the rest of the document.**

### 1.1 Purpose and Scope of the Verifier Guidance

The Verifier Guidance supports Verifiers in producing **clear, consistent, and usable verified assessment reports**.

#### Box 1 – Purpose, scope, and authority

The **SLCP Verification Protocol** defines all mandatory requirements for verification.

The **Verifier Guidance**:

- Supports consistent application of those requirements
- Explains how Protocol requirements are applied in practice
- Uses examples to illustrate expectations for Verifiers and data users.

The Verifier Guidance **does not**:

- Introduce new requirements
- Reinterpret Protocol obligations
- Replace or override the Verification Protocol.

Where the Protocol states “refer to Verifier Guidance” or similar wording, the relevant explanations or examples are included here **without changing intent**. The Guidance applies to all SLCP validation methods:

- Onsite Verification
- Virtual + Onsite Verification
- Full Virtual Verification.

### 1.2 How to Use this Document

This document is designed for **reference use**, not linear reading. Verifiers are encouraged to:

- Navigate directly to the section relevant to the task they are performing
- Rely on examples to understand expectations
- Return to the Verification Protocol whenever a mandatory requirement needs confirmation.

Different sections serve different purposes:

- **Sections 2–3**: Understanding the Tool and core verification activities
- **Section 4**: Writing a high-quality verified assessment report
- **Sections 5–6**: Verification-type-specific guidance and Worker Engagement
- **Section 7**: Quality review, follow-up, and common issues

Examples throughout this document are **illustrative**, not templates.

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## Box 2 – Using the Tool and platform guidance

Each [Accredited Host \(AH\)](#) provides a platform-specific user guide for Verifiers. These guides explain how to navigate the AH platform in Verifier view and are available through the [SLCP Helpdesk](#).

This Verifier Guidance:

- Explains how to apply Verification Protocol requirements when completing the Tool
- Focuses on verification practice and report content, not platform navigation.

For **offline Tool use (onsite verification only)**, refer to:

- The relevant sections of this Verifier Guidance
- The offline Tool [tutorial](#) available on the SLCP Helpdesk.

Verifiers should always use the **AH-specific user guide** alongside this document when working in an online platform.

### 1.3 The 12-month Self/Joint-Assessment Period

**Verification must not happen more than 2 months from completion of the self/joint-assessment.**

Should the facility/Verifier Body miss this timeframe for verification, the facility must reach out to SLCP for support through the Helpdesk to revert the status of the assessment back to ASI-Assessment Initiated so the facility can update the self/joint-assessment.

The data to reference for the self/joint-assessment period (and verification) must **ALWAYS be 12 months prior to the date of the self/joint-assessment submission**. Exception is the Facility Profile section where the most up-to-date facility information will be used.

There is potential for a facility to complete their self/joint-assessment and wait before they submit it as "completed" on the Accredited Host platform. However, it is the responsibility of the Verifier to check that the verification is taking place within two months of the date of Self-Assessment completion, and this date is the date that is entered into the Tool under Facility Profile section question FP-BAS-26 Date of self/ or joint-assessment submission (YYYY-MM-DD).

### 1.4 Data Integrity

**Your role as a Verifier to ensure data integrity**

As per the [Terms of Use for SLCP Converged Assessment Framework \(CAF\)](#): “Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, Verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users”.

In addition, the [SLCP Signatory Charter](#) notes in the Commitment for Manufacturers, Brands & Retailers, and Agents, that they commit to “respect the principle of true data in SLCP assessments by recording and accepting honest data, and by prioritizing remediation over punishment”.

#### [SLCP Quality Assurance Manual](#)

VBs and Verifiers need to read the SLCP [Quality Assurance Manual](#), which provides important information about the VB and Verifier selection process as well as Quality Assurance (QA) processes and mechanisms. These are in place to ensure a high level of quality and integrity of SLCP verification.

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## 1.5 Ethical Behavior

Any user of the SLCP system and the Converged Assessment Framework (CAF) must act with integrity and respect the principle of true data. This means SLCP does not tolerate any act of bribery or unethical behavior by any user of the CAF.

- SLCP defines bribery as any attempt to influence the outcomes of a verification by offering, soliciting or accepting any items of value, including (but not limited to) money, services, merchandise or gifts.
- Unethical behavior is considered any attempt to knowingly falsify Assessor/Verifier Explanation or verification outcomes through providing misleading or incorrect information, misrepresenting verification activities or otherwise acting dishonestly.

If the facility engages in unethical behavior, the Verifier is required to select the appropriate options available under the "Integrity / Honest Data" set of questions in Verification / Assessment Details of the Tool.

Only confirmed details must be reported in response to the Integrity / Honest Data questions. The questions are grounded in the SLCP CAF Terms of Use, which states, "Data collection and verification through the CAF should reflect actual labor conditions. Users of the CAF and the Verified Assessments (facilities, verifiers, brands and other organizations) commit to reporting accurate information to the best of their knowledge and to supporting the integrity of the data shared among users." The SLCP Signatory Charter also calls for signatories to "respect the principle of true data in SLCP assessments by recording and accepting honest data, and by prioritizing remediation over punishment". Facilities should thus report actual conditions and be transparent about any non-compliance with applicable legal requirements or facility practices like double bookkeeping.

**Important:** The Integrity / Honest Data questions do not replace the submission of the [Confidential Information Report Form](#). If any of the Integrity / Honest Data questions are applicable, i.e., the facility is being dishonest, the Verifier must complete the [Confidential Information Report](#) in addition to providing details in the Verification / Assessment Details of the Tool. Unlike the information entered into Verification / Assessment Details, the Confidential Information Report Form is not visible to the facility and is internal to SLCP and shared in confidence with applicable approved VBs and Verifiers.

If a Verifier is subject to any form of intimidation and/or bribery, the Verifier must report the incident to the VOO immediately and has the right to end the verification at any time.

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## 1.6 Reporting Issues outside Final Verified Assessment Report

As required in the [Verification Protocol](#), Verifiers and/or the Verifier Body (VB) must submit details about unconfirmed, sensitive or zero tolerance-type issues that are confirmed or unconfirmed and suspicions related to their assigned facility, to the Verification Oversight Organization (VOO) via the designated [online Confidential Information Report Form](#).

The intent of this form is to maintain SLCP data integrity and to report **sensitive or unconfirmed information concerning the facility**.

- Reported information will be **kept internal to SLCP and may be shared in confidence with applicable approved VBs and Verifiers**.
- Applicable information will be maintained on a private facility profile visible to SLCP, the VOO, and any VB assigned a verification for the facility.
- Even if the Verifier was able to include the sensitive information in the verified assessment report and the facility allowed the report to be published, **the form must still be used to highlight the**

**issue separately for the next Verifier Body/Verifier, as previous reports are not always accessible to Verifier Bodies/Verifiers.**

- The information may come directly from the verification, from the Verifier, or through other means such as worker hotlines maintained by the VB. It may relate to the self-assessment or verification timeframe, or to matters outside of the assessment timeframe.

If the Verifier Body has its own worker hotline as part of its service offering and is permitted to share the information with the VOO and SLCP, the information must be shared via the form. Information may be submitted at any time, not only during or shortly after verification.

### 1.6.1 Examples

<b>EXAMPLES: Sensitive issues and suspicious activities (remember to also include in the Confidential Information Report Form even if already included in the verification report)</b>	
1.	Sensitive information that could not be shared because the Verifier has to keep the identity of the worker confidential to protect from retaliation.
2.	Information of non-compliances or inaccuracies that could not be shared because they were outside of the assessment scope timeframe.
3.	Unverified interview statement or inability to properly triangulate a finding, which: <ul style="list-style-type: none"> <li>- Would result in an "Inaccurate - Incorrect" determination, but unconfirmed so cannot be applied</li> <li>- Indicates a potential legal issue or non-compliance to generally accepted codes of conduct (e.g., unconfirmed reports of verbal abuse, harassment)</li> </ul>
4.	Transparency or ethics issues, such as: <ul style="list-style-type: none"> <li>- Facility offers a bribe to Verifier and Verifier can or cannot include this information in the report</li> <li>- Unconfirmed or confirmed concerns of facility not sharing accurate data, like maintaining double books or falsified records</li> </ul> Suspicion or confirmation of interview coaching, hiding workers/ production, or other manipulation of the verification
5.	Suspicion or confirmation of zero tolerance conditions (on day of verification or within assessment timeframe) like forced labor, human trafficking, hiding presence of ethnic minorities, child labor, etc. Apply your auditor knowledge of zero tolerance issues mentioned in codes of conduct and/or certification programs.
6.	Facility management is obstructive or unprofessional
<b>Possible scenarios</b>	
1.	The week after the self-assessment was closed a worker was not paid overtime wages, there is no other non-compliance on OT wage payments in the assessment timeframe, and the facility does not want the finding included in the Assessor/Verifier Explanation.
2.	During walkthrough the Verifier notices workers diverting their gaze, keeping their heads down and moving away from the areas of focus. The facility has a complaint mechanism for workers but there are zero complaint records. Management ignores workers and becomes dismissive and agitated if workers are too close to the Verifier.

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## 1.7 Relationship to the Converged Assessment Framework (CAF)

The Converged Assessment Framework (CAF) consists of three elements:

<p><b>Data Collection Tool</b></p>	<ul style="list-style-type: none"> <li>➤ Used by facilities and Verifiers</li> <li>➤ Records facility data and Assessor/Verifier Explanation on social and labor conditions</li> <li>➤ Completed through an Active Accredited Host (AH) platform or via downloadable Excel (offline use available for onsite verification only; online completion is recommended)</li> </ul>
<p><b>Protocols</b></p>	<ul style="list-style-type: none"> <li>➤ <a href="#">Verification Protocol</a>: Mandatory verification procedures and requirements for SLCP approved Verifier Bodies (VBs) and Verifiers</li> <li>➤ <a href="#">Quality Assurance Manual</a>: requirements for VB and Verifier approval and oversight</li> <li>➤ <a href="#">WE Tech Protocol</a>: requirements for facilities and Verifiers using the Worker Engagement (WE) Question Set with SLCP approved service providers</li> </ul>
<p><b>Guidance</b></p>	<ul style="list-style-type: none"> <li>➤ <a href="#">Facility Guidance</a>: Supports facilities in completing the self/joint-assessment</li> <li>➤ <a href="#">Verifier Guidance</a>: supports Verifiers in applying the Verification Protocol and preparing the verified assessment report</li> <li>➤ <a href="#">All CAF resources</a> and support materials are available in the SLCP Helpdesk</li> <li>➤ <a href="#">General SLCP process information</a> (training, Gateway registration, assessment completion, verification and data sharing)</li> </ul>

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## 2. The Tool

This section explains how the Data Collection Tool functions from a Verifier's perspective. It focuses on how the Tool is structured, how information appears, and how system behavior affects your work during verification. This section does not replace the Verification Protocol. For verification methodology, legal interpretation, and reporting requirements, refer to the Verification Protocol and Sections 3 and 4 of this Guidance.

### 2.1 Tool Structure

The Tool contains the facility's self/joint-assessment responses and the fields that the Verifier must complete during verification. When the Tool is opened in **Verifier View**, additional fields and sections become visible. These allow the Verifier to review, confirm, or correct facility responses and record verification details. The Tool is dynamic. The questions displayed depend on the selected **Step** and on facility-specific characteristics.

#### 2.1.1 Facility View vs Verifier View

In **Facility View**, the Tool contains only the questions the facility must answer as part of the self/joint-assessment.

In **Verifier View**, the Tool includes:

- Additional fields next to each facility response (e.g., Assessor/Verifier Selection, Response, Explanation, and related fields)
- The Verification / Assessment Details section
- The Verification Summary section

Once verification begins through the Accredited Host platform, the facility's original responses are locked and cannot be edited directly. Any correction must be made through the Verifier fields provided in Verifier View.

Verifier View does not change the structure of the questions themselves, but it expands the fields available for completion.

#### 2.1.2 Overview of Tool Sections

There are two additional sections of the Tool in Verifier View

1. Verification/Assessment Details
2. Verification Summary

Common to both the Facility View and Verifier View of the Tool are the below sections and sub-sections:

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**Facility and Verifier View Sections and Subsections**

Tool Section	Tool Subsection	Total Number of Master Type "Question" (Step 3 scope)
1. <b>FACILITY PROFILE</b>	<ul style="list-style-type: none"> <li>• Step Selection</li> <li>• OAR/ OS ID</li> <li>• Basic Information</li> <li>• Building Structures</li> <li>• Worker Demographics</li> <li>• Nationalities</li> <li>• Languages</li> <li>• Operating Licenses</li> <li>• Certifications</li> <li>• Production / Operation Information</li> <li>• Subcontractors Used for Production / Operation</li> <li>• Facility Comments</li> </ul>	309
2. <b>RECRUITMENT &amp; HIRING</b>	<ul style="list-style-type: none"> <li>• Child Labor</li> <li>• Apprenticeship / Trainee / Internship Programs</li> <li>• Forced Labor</li> <li>• Recruitment Practices</li> <li>• Discrimination</li> <li>• Employment Practices</li> <li>• Homeworkers</li> <li>• Facility Comments</li> </ul>	132
3. <b>WORKING HOURS</b>	<ul style="list-style-type: none"> <li>• Working Hours</li> <li>• Forced Labor</li> <li>• Overtime</li> <li>• Facility Comments</li> </ul>	69
4. <b>WAGES &amp; BENEFITS</b>	<ul style="list-style-type: none"> <li>• Wages and Benefits</li> <li>• Facility Comments</li> </ul>	236
5. <b>WORKER TREATMENT</b>	<ul style="list-style-type: none"> <li>• Forced Labor</li> <li>• Harassment and Abuse</li> <li>• Discrimination</li> <li>• Discipline</li> <li>• Worker Treatment</li> <li>• Facility Comments</li> </ul>	163
6. <b>WORKER INVOLVEMENT</b>	<ul style="list-style-type: none"> <li>• FOA &amp; CB</li> <li>• Workplace Cooperation</li> <li>• Grievance Systems</li> <li>• Worker Feedback</li> <li>• Facility Comments</li> </ul>	168

<p>7. <b>HEALTH &amp; SAFETY</b></p>	<ul style="list-style-type: none"> <li>• General Work Environment</li> <li>• Building Safety</li> <li>• Risk Assessment</li> <li>• HS Policy/ Plan</li> <li>• Qualified HS Staff</li> <li>• HS Committee</li> <li>• HS Worker Engagement</li> <li>• Emergency Preparedness</li> <li>• Flammable and Combustible Materials</li> <li>• Chemicals and Hazardous Substances</li> <li>• Worker Protection</li> <li>• Materials Handling and Storage</li> <li>• Safety Warnings</li> <li>• Electrical Safety</li> <li>• First Aid and Medical</li> <li>• Contractor Safety</li> <li>• Dormitories</li> <li>• Canteens</li> <li>• Childcare</li> <li>• Children</li> <li>• Facilities</li> <li>• Health &amp; Safety</li> <li>• Facility Comments</li> </ul>	<p>410</p>
<p>8. <b>TERMINATION</b></p>	<ul style="list-style-type: none"> <li>• Forced Labor</li> <li>• Employment Practices</li> <li>• Discrimination</li> <li>• Termination</li> <li>• Facility Comments</li> </ul>	<p>39</p>
<p>9. <b>MANAGEMENT SYSTEMS (STEP 2 AND 3 ONLY)</b></p>	<ul style="list-style-type: none"> <li>• Plan (Policies &amp; Procedures, Strategy and Goals)</li> <li>• Do (Roles and Responsibilities, Communication and Training)</li> <li>• Check (Monitoring, Self-Assessment)</li> <li>• Act (Continuous Improvement)</li> <li>• Facility Comments</li> </ul>	<p>449</p>
<p>10. <b>ABOVE AND BEYOND (STEP 3 ONLY)</b></p>	<ul style="list-style-type: none"> <li>• Workplace Well-Being</li> <li>• Community Impact</li> <li>• Facility Comments</li> </ul>	<p>83</p>

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**Additional Section of the Data Collection Tool visible in “Verifier View”**

Tool Section	Tool Subsection	Number of Questions
11. <b>VERIFICATION/ ASSESSMENT DETAILS</b>	<ul style="list-style-type: none"> <li>• Validation Method</li> <li>• Verification/Assessment Dates</li> <li>• Verification/Assessment Duration</li> <li>• Verification/Assessment Window</li> <li>• Verifier/Assessor Information</li> <li>• APSCA ID</li> <li>• Verification/Assessment Participants</li> <li>• Exception Requests</li> <li>• Worker Interviews</li> <li>• Verification/Assessment Observations</li> </ul>	51
12. <b>VERIFICATION SUMMARY</b>	<ul style="list-style-type: none"> <li>• Automated information pulling from Verifier answers</li> <li>• To facilitate the Closing Meeting and provide the Verifier and facility with a key summary of all “Inaccurate – Incorrect” and “Non-Compliance” items</li> </ul>	NA

**Maximum number\* of questions in each Step:**

<b>Step 1</b>	<b>923</b> including country specific questions (Bangladesh; Cambodia; Ethiopia; Indonesia; Pakistan; Vietnam)
<b>Step 2</b>	<b>Step 1 (923) + 1055 = Total 1978</b>
<b>Step 3</b>	<b>Step 2 (1978) + 306 = Total 2284</b>

**Note:** The number shown represents the maximum possible questions. The actual number visible will vary depending on the selected Step, facility characteristics, conditional logic, and country-specific questions.

**2.1.3 Step Selection and Dynamic Question Flow**

The Tool operates under three Steps (Step 1, Step 2, and Step 3). The Step selected determines the scope of questions that appear. Higher Steps include all questions from lower Steps, plus additional questions. The Step is selected before the self/joint-assessment begins and determines the overall scope of the assessment. The Tool dynamically adjusts question visibility based on:

- The selected Step
- Facility characteristics
- Responses provided

Verifiers must ensure they understand the selected Step before beginning review, as this affects the expected scope of information. For details on Step definitions and requirements, refer to the Verification Protocol.

### 2.1.4 Conditional Logic and Question Visibility

The Tool uses conditional logic. This means that certain answers automatically trigger additional questions, for example:

- If the facility indicates that it provides dormitories, additional dormitory-related questions will appear.
- If the facility indicates that it employs workers under 18, young worker-related questions will become visible.

Conditional questions may appear within the same section, or in a different section later in the Tool. When a Verifier changes a facility response during verification, new conditional questions may become visible. After making corrections, it is important to review the surrounding and downstream sections to ensure that all newly visible questions are completed.

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## 2.2 Tool Features

This section explains the core fields and system features that Verifiers interact with when completing a verification in Verifier View. It focuses on how the Tool functions and how fields are activated. It does not provide guidance on how to determine outcomes, assess evidence, or draft explanations. For those requirements, refer to Section 3, Section 4 of this Guidance and the Verification Protocol.

### 2.2.1 Verifier Columns and Core Fields

The appearance of the Tool may vary slightly depending on the Accredited Host platform used. However, the structure and content of the Tool remain consistent across platforms and between the online and offline versions. For platform-specific navigation guidance, refer to the [Helpdesk resources](#) provided by the relevant Accredited Host.

In Verifier View, additional fields appear alongside each facility response. These fields allow the Verifier to review, confirm, or correct the facility's self/joint-assessment responses. The terminology used may differ slightly between the Offline Excel Tool and the Online Accredited Host platform, as shown below:

Offline Tool	Online Tool
Verification Selection	Assessor/Verifier Selection
Corrected Response	Assessor/Verifier Response
Verification Data	Assessor/Verifier Explanation
Non-compliance	Non-compliance
Legal Reference	Legal Reference

**Note:** The online Tool, accessed through the Accredited Host platform, is the primary and recommended version for conducting verifications. It is also the only version available for Virtual + Onsite Verification and Full Virtual Verification. For consistency, this Guidance uses the field labels as they appear in the online Tool throughout the document.

In Verifier View, the following columns appear alongside the facility's self/joint-assessment responses:

Field	Purpose	When It Becomes Active	System Behavior
<b>Assessor/Verifier Selection</b>	Records the Verifier's determination regarding the facility response	For each applicable question	Activates other fields depending on selection; required unless system-disabled
<b>Assessor/Verifier Response</b>	Records corrected or updated data	When the selection requires correction or update	Captures the Verifier's replacement response without altering the original facility response
<b>Assessor/Verifier Explanation</b>	Documents context or reasoning for the selection	When triggered by the selection or other activated fields	Becomes mandatory depending on selection; visible to users of the verified assessment
<b>Non-Compliance</b>	Indicates that the facility is not in line with applicable legal requirements	When applicable based on the verifier's assessment	Activates the Legal Reference field
<b>Legal Reference</b>	Records the applicable legal citation	When Non-Compliance is selected	Must be completed together with Non-Compliance
<b>Photo / File Upload to Accredited Host</b>	Allows supporting documentation to be uploaded	When documentation is available or required	Upload functionality managed through the Accredited Host platform

### 2.2.2 Verification / Assessment Details

The **Verification / Assessment Details** section is visible only in Verifier View. It is separate from the facility's self/joint-assessment responses and must be completed by the Verifier as part of the verified assessment record. This section captures structured information about how the verification was conducted. It includes fields related to:

Verification / Assessment Details	
APSCA ID	Physical Scope Covered
Documentation Review	Quality / Report Review Information
Exception Requests	Validation Method
Facility Cooperativeness	Verification / Assessment Dates
Integrity / Honest Data	Verification / Assessment Duration
Management Interviews	Verification / Assessment Participants
Management Practices	Verification / Assessment Window
Other Comments	Verifier / Assessor Information
Photos	Worker Interviews

Each field in this section may include "More Info" guidance to clarify what information is required. Some fields may be system-driven or pre-populated depending on selections made in the Accredited Host platform. Other fields require direct input from the Verifier.

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### 2.2.2.1 Validation Method

The Validation Method reflects how verification activities were conducted and is applied to Tool questions based on the selected verification type. **Note** the options starting with BW are for Better Work facilities only. The Three (3) SLCP Validation Methods are:

1. SLCP Onsite Verification
  2. SLCP Virtual + Onsite Verification
  3. SLCP Full Virtual Verification
- If the Verifier selects “**SLCP Onsite Verification**” or “**SLCP Full Virtual Verification**” the Validation Method is automated in the online Tool via the AH Platform, and the **Verifier need not do anything**.
  - **If the Verifier selects “SLCP Virtual + Onsite Verification” the Verifier needs to manually select when a data point is verified virtually.**
    - The **default selection for the Validation Method is “SLCP Onsite Verification”** –if the data point is being verified onsite the Verifier need not do anything. Only when the **data point is being verified virtually must the Verifier change the selection to “SLCP Virtual Verification”**.
    - The Validation Method field appears for each data point in the online Tool for SLCP Virtual + Onsite Verification.

### 2.2.2.2 Integrity and Honest Data

The Verification / Assessment Details section includes structured fields related to integrity and honest data considerations. These fields allow the Verifier to document circumstances such as denied access, restricted information, or concerns regarding the reliability, completeness, or accuracy of information provided during verification.

If integrity-related concerns arise, the Verifier must record the relevant details in the Verification / Assessment Details section and follow the applicable procedures outlined in the Verification Protocol.

**If any Integrity / Honest Data questions are applicable, for example, where the facility is found to be dishonest or where access is denied, the Verifier must complete the [Confidential Information Report Form](#) in addition to providing details in the Verification / Assessment Details section.**

Information entered in the Verification / Assessment Details section is visible to the facility as part of the verified assessment report. However, information submitted through the Confidential Information Report Form is not attributed to the Verifier and is not visible to the facility. It is accessible only to SLCP and other approved Verifier Bodies and Verifiers who may engage with the facility in future verifications.

### 2.2.2.3 Visibility of Information

Information entered in the Verification / Assessment Details section becomes part of the verified assessment report and is visible to the facility and to users of the verified data. Verifiers must ensure that entries are factual, clear, and aligned with the verification activities conducted. Completion requirements and reporting obligations related to this section are governed by the Verification Protocol.

### 2.2.3 Facility Comments

At the end of each main section of the Tool, the facility may enter additional information under “**Facility Comments.**” These comments are not verified as individual data points. However, they may provide useful context regarding the facility’s circumstances, limitations, or challenges encountered during completion of the self/joint-assessment.

When first opening the Tool in Verifier View, it is recommended that the Verifier review the Facility Comments within each section to identify any contextual information that may affect the verification

approach. Facility Comments remain visible in Verifier View and may inform follow-up questions during verification.

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## 2.2.4 Follow-Up Questions

**Follow-up question numbers end with .1, .2, .3, in the Tool.**

The Assessor/Verifier Response option is not applicable for Follow-up Questions where the facility provides a description.

Since all Follow-up Questions have free narrative answers, only the Assessor/Verifier Explanation field is sufficient to offer an opportunity for the Verifier to provide the correct information and additional details on the facility's circumstances, if necessary.

**For example:** "FP-BUI-7: Number of off-site housing sites occupied by workers managed and controlled by an entity other than the facility". If the facility selects a response great than 0 (>0) then a follow up question appears marked by ".1" at the end of the number:

"FP-BUI-7.1: Please provide details of the housing arrangements, including at minimum how many workers are living in the building, who is managing the building and what is the relationship between the facility and the entity providing the housing:"

The facility responds with a free narrative answer. Any correction/ addition made by the Verifier can then be entered into the Assessor/Verifier Explanation field.

## 2.2.5 "More Info" / Guidance

Most questions in the Tool include a "**More Info**"/**Guidance**. The "More Info" displays relevant guidance without requiring navigation away from the question. The "More Info" content may include:

- Definitions and explanations of key terms
- Clarification of the intent of the question
- Calculation methods (e.g., measurement or wage calculations)
- Legal compliance considerations
- Distinctions between similar concepts
- Scenario-based answer guidance
- Instructions specific to completion of Verification / Assessment Details fields

Verifiers must review the "More Info" content carefully, particularly where questions involve legal interpretation, calculations, or technical distinctions.

## 2.3 Using the Online and Offline Tools

The SLCP Data Collection Tool is accessed through an Accredited Host (AH) platform. Verifications may be conducted using the online Tool or, where permitted, the offline Excel Tool.

The online Tool is the primary and recommended method for completing verifications. The offline Excel Tool is available only under specific circumstances and must ultimately be uploaded to the Accredited Host platform to complete the verification process. This section explains how both versions function and outlines important technical considerations for Verifiers.

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### 2.3.1 Online Tool (Accredited Host Platform)

The online Tool, accessed through the Accredited Host platform selected by the facility, is the primary method for conducting verifications. It is the only version available for:

- SLCP Virtual + Onsite Verification
- SLCP Full Virtual Verification

Once the Verifier is granted access to conduct the verification, the facility's self/joint-assessment responses become locked and can no longer be edited by either the facility or the Verifier. At this stage, the assessment status changes to **Verification in Progress (VRP)** in accordance with SLCP workflow.

The verification may be conducted fully online (recommended) or, where permitted, partially offline using the **Excel Tool for Onsite Verification only**. However, the verification process must always conclude on the **Accredited Host platform**. The online Tool includes system-controlled features such as:

- Automated application of the selected Validation Method (where applicable)
- Structured completion requirements
- System-driven activation of required fields
- Data validation checks prior to submission

Before final submission, the Accredited Host platform runs data validation checks to ensure:

- Required fields are completed
- Proper formats are used (e.g., dates and numeric fields)
- English-language text is entered where required
- Assessor/Verifier fields align with the selected verification determinations

These platform-level checks focus on data completeness and format accuracy. They do not replace the quality review conducted by the Verifier Body, which is responsible for ensuring the clarity, adequacy, and accuracy of narrative content in the Assessor/Verifier Explanation fields and the overall verified assessment report.

**Supporting documents, photos, and attachments** must be uploaded through the [Accredited Host platform](#). Upload functionality and instructions may vary slightly by platform and are available through Helpdesk resources. Verifiers may upload documentation directly to specific questions or designated upload fields within the Tool.

In addition to the self/joint-assessment responses, Verifiers may access documents or files uploaded by the facility during the self/joint-assessment process through the Accredited Host platform. Following completion of the verification and required reviews, the assessment status progresses in accordance with SLCP procedures (e.g., VRP to VRC to VRF). For guidance on using the offline Tool to collect findings, refer to the relevant FAQs available through the [SLCP Helpdesk](#).

**Note:** Question VD-VERI-25 asks: Are there any photos you would like to add to the verification that did not directly correspond to a question? This is where the Verifier can upload files/ photos/ documents that do not directly relate to any specific question. If the Verifier chooses to upload multiple photos/ documents, it is recommended to create one document (Word or PDF) that contains all files and to label the files/photos appropriately to give the user a clear description of the item.

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### 2.3.2 Offline Excel Tool

The offline Excel Tool is available only for **Onsite Verification** and may be used when necessary (e.g., unstable internet access). The Tool must be downloaded from the Accredited Host platform and once completed, must be uploaded back to the platform to finalize the verification process. The verification process must always conclude on the Accredited Host platform.

The offline Excel Tool contains multiple worksheets that support completion of the verification. In Verifier View, the file includes four main parts:

1. **Overview:** Contains important information about the Tool, including macro enablement instructions, general SLCP process information, and the Terms of Use.
2. **Instructions:** Explains how to navigate the file, complete required fields, select the applicable Step, and understand the scope, standards, and timeframe of the assessment.
3. **SLCP Data Collection Tool:** Contains the full set of questions organized into the main sections of the Tool. The questions that appear depend on the selected Step and the facility's responses (e.g., presence of workers under 18, migrant workers, operational characteristics). In Verifier View, this worksheet also includes the Assessor/Verifier columns required for verification completion.
4. **Verification Summary:** Contains a table that can be automatically generated to summarize all "Inaccurate – Incorrect" and "Non-Compliance" items. The summary is created or updated by selecting the designated link within the worksheet. Verifiers should click once and allow the file to process the request. Double-clicking may cause errors, particularly in large files.

The Verification Summary supports preparation for the closing meeting and provides a consolidated view of key findings. If changes are made in the Data Collection Tool worksheet, the summary must be updated accordingly. For familiarization purposes, the following Tool documents are available for download via the [SLCP Helpdesk](#):

1. **Data Collection Tool v.1.7.1 functional (with macros):** This version reflects the Tool as completed by a facility. Conditional questions remain hidden unless triggered by responses. It may be used to understand how the Tool functions from the facility perspective.
2. **Data Collection Tool v.1.7.1 all questions visible:** This version reflects the Tool in Facility View but with all questions unhidden, it is non-functional and for information purposes only to see all questions in the format of the offline Excel Tool for facilities.
3. **Data Collection Tool v.1.7.1 flat file:** This file displays all fields and all possible questions within the Data Collection Tool. It is useful for sorting, filtering, and gaining a comprehensive understanding of the Tool's full scope.

These reference documents are provided for informational purposes only. They cannot be used to complete the SLCP assessment or verification process. Verifications must be conducted through the Accredited Host platform. After the offline Tool is uploaded, the Accredited Host platform runs validation checks similar to those applied in the online Tool. This may require corrections to formatting or completion before final submission.

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In the offline Tool:

- Dark grey fields indicate no facility response.
- Light grey fields indicate a facility response has been entered.
- Verifiers must still complete Assessor/Verifier fields even where the facility did not respond.

Certain multi-select dropdown menus allow the facility to select “X” or leave blank. When correcting such responses, the Assessor/Verifier Response may remain visually unchanged (e.g., blank) even though it represents a completed correction. Verifiers must carefully review these cells before submission.

Attachments cannot be embedded directly in the offline Excel Tool. **All supporting documents must be uploaded through the Accredited Host platform after re-uploading the completed offline Tool.**

### 2.3.2.1 Opening and Saving the Offline Tool

**Macros must be enabled for the content to display correctly.** Due to the complex nature of the macros included, only ONE Excel workbook should be open at a time. Opening multiple workbooks may cause user issues.

**Version Compatibility:** SLCP recommends that PC users have at least Excel 2016 and Mac users have Excel 2016 licenses. If the instructions are followed on how to handle the Tool and it still continues to crash while working, a more recent version of Excel should be installed.

According to Microsoft, users must either click **ENABLE MACROS** when prompted upon opening the file, or unblock macros by doing the following:

1. Save the file to a local hard drive or cloud share (e.g., OneDrive).
2. Open Windows File Explorer and navigate to the folder where the file is saved.
3. Right-click the file and choose **Properties**.
4. At the bottom of the General tab, select the **Unblock** checkbox and click **OK**.

Document can be renamed and saved. **Remember to save often!** For a short tutorial on how to enable macros please see this [FAQ in Helpdesk](#).

**Note:** In the offline Tool, dark grey fields indicate that the facility has not provided a response. When the facility provides a response, the field changes to light grey. For dark grey fields where no facility response was entered, the Verifier must still complete the Assessor/Verifier Response and provide an Assessor/Verifier Explanation to support the determination.

### 2.3.2.2 Uploading the Offline Tool and Attachments

Once the Verifier obtains access to the Tool for verification from the Accredited Host platform, the Tool may be uploaded and downloaded multiple times to facilitate completion of the verified assessment report. However, the final step must be to upload the completed offline Tool to the Accredited Host platform.

Upon upload, the Accredited Host will run data validation checks to ensure specific verification fields are complete and that facility and Verifier fields are completed appropriately with regard to English language use, character limits, and required date and number formats. Supporting documentation, files, and photos must be uploaded through the Accredited Host platform.

**Note:** Question **VD-VERI-25** asks: Are there any photos you would like to add to the verification that did not directly correspond to a question? This is where the Verifier can upload files/ photos/ documents that do not directly relate to any specific question. If the Verifier chooses to upload multiple photos/ documents, it is recommended to create one document (Word or PDF) that contains all files and to label the files/photos appropriately to give the user a clear description of the item.

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### 2.3.2.3 Data Privacy

Verifier shall **follow all applicable data privacy laws and regulations** when conducting the verification, this includes taking pictures of and uploading documents in conjunction with the verified assessment report.

SLCP recommends only taking a sample and blacking out all private information/ information that can be traced back to an individual when providing proof/ documents to back up the verification outcome.

If a facility does not permit photos of work in progress to be submitted due to confidentiality, then the Verifier must note in the verification report under “Verification/Assessment Details” that the facility did not permit a photo of the work in progress/ production line (or other) due to confidentiality/ visibility of brand logos, etc.

**Note:** The facility must provide reasonable explanation as to why photos will breach confidentiality. If the Verifier suspects denial of photos based on reasons other than data privacy, then the Verifier needs to explain this in Verification/Assessment Details.

#### 2.3.2.4 Reviewing Documents

**Remember to review documents carefully!** Reviewing the contents of the facility’s documentation is important. Some policy documents, for example, include reference to several different social and labor issues; however, this may not be overly apparent unless the document is carefully reviewed. An overarching Human Rights policy can include specific reference to a few different issues such as child labor, forced labor, discrimination, etc., and would therefore be the same policy document referenced for each specific social/ labor issue. Not reviewing this documentation could lead to an inaccurate verified report.

#### 2.3.2.5 Trouble Shooting/ Errors Guide for Offline Excel Tool

##### 1. Verifier Selection

- **When completing the Verifier Selection, you must ‘select’ your answer from the dropdown menu rather than copying and pasting text from one cell to another.** Not all dropdown menus are the same and copying and pasting will cause an error in the color coding of subsequent cells. If this happens, **DO NOT SAVE THE FILE**, quit out of Excel entirely, relaunch the file, enabling macros. You will lose the data you entered since the last time you saved, so save often!
- **If you attempt to enter text in a Verifier Selection dropdown menu, you will get an alert saying, “invalid selection”.** In this case, just select “retry” in the error window, click the delete key to delete your highlighted entry and then make the proper selection in the dropdown menu.

##### 2. Macros

While testing the file in Verifier View, there have been instances where the macros do not work properly. In some cases, the program/ Excel **does not show an error message before the macros shut down**. This error happens especially on MAC Operating Systems.

**You should periodically test to ensure macros are working.** To do this, you must **check that the navigation bar is accurately indicating where you are in the Tool**. Click on a few different cells in different categories to confirm that “You are here...” does indeed show where you are. If the navigation bar information does not change then your macros have stopped working properly. In this case, quit Excel entirely, relaunch the file and enable macros. You will lose the data you entered since the last time you saved, so save often!

Once you have relaunched Excel, reopened the file and enabled macros, if the navigation bar tells you correctly where you are then you know that the macros are working. If you are experiencing persistent errors with macros, work in the online Tool instead.

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#### 2.3.2.6 Offline Tool Limitation

There is a limitation of the offline Tool for certain **multi-select dropdown menus that allow the facility to select “X” or leave the field blank** to indicate no selection.

If the Verifier identifies an “X” selection made by the facility as inaccurate and selects **“Inaccurate – Misunderstanding”** or **“Inaccurate – Incorrect,”** the **Verifier Response cell may remain dark blue** because technically no data is selected — even though the blank cell represents the Verifier’s correction. This behavior may also occur when the Verifier selects:

- “Updated during Verification” in the Facility Profile section
- “Not visible to facility during SA/JA”
- “Facility did not reply during SA/JA”

If the Tool automatically selects “Facility did not reply during SA/JA” and the Verifier Response remains blank, the cell may stay dark blue instead of light blue, even though the response is complete. **When reviewing the offline Tool before submission to the Accredited Host platform, the Verifier must confirm that dark blue blank cells represent intentional Verifier Responses and are not incomplete entries.**

**Formulas:** If you accidentally enter a formula in a free text response cell, i.e., equal sign = or +, this will create an error. In this case, quit Excel entirely, relaunch the file and enable macros. You will lose the data you entered since the last time you saved, so save often!

### 2.3.2.7 Color Guide (Offline Tool Only)

The offline Excel Tool uses color coding to guide the Verifier during completion. The table below summarizes the meaning and expected action for each color.

Color	Where It Appears	Meaning	Verifier Action Required
Dark Blue	Verifier Selection field	A selection is required	Must select a Verifier Selection unless system-disabled
Light Blue	Verifier Response / Explanation fields	No immediate action required	Complete only if applicable (e.g., correction, Non-Compliance, additional context)
Medium Blue	Mandatory narrative / explanation fields	For the 179 Tool Question Keys identified in the Appendix where an Assessor/Verifier explanation is mandatory	Must complete the narrative before submission
Red	When Inaccurate – Incorrect / Inaccurate – Misunderstanding is selected, when both Non-Compliance and Legal Reference are completed	Highlights key issues requiring attention	Ensure explanation is completed and Legal Reference entered where required
Dark Grey	Facility response cell	Facility did not provide a response	Verifier must still complete Verifier fields
Light Grey	Facility response cell	Facility provided a response	Review and verify response

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### Special Selection Behaviors (Offline Tool)

Certain Verifier Selections activate specific behaviors:

Selection	Behavior	Required Action
Updated during Verification ( <b>Facility Profile only</b> )	Highlights updated data	Must enter Verifier Response and Explanation
Inaccurate – Incorrect	Indicates inaccurate facility response	Must correct response and explain
Inaccurate – Misunderstanding	Indicates facility misunderstood question	Must correct response and explain
Facility did not reply during SA/JA	Indicates no facility response	Must enter correct response and explain
Not visible to facility during SA/JA	Question not shown during SA/JA	Must determine response and explain where required
Not applicable due to special facility circumstances	Question does not apply	Must explain why not applicable
Verification not Required	No verification required	No response required; explanation optional

**Important:** Color coding is a functional guide within the offline Tool. It does not replace verification judgment or reporting requirements defined in the Verification Protocol

#### 2.3.2.8 Completing the Verifier Response (Offline Tool)

Verifier Response options are selected from dropdown menus. Verifiers must:

- Select responses directly from dropdown menus
- Avoid copying and pasting values between cells
- Ensure numeric and date fields follow the required format
- Enter text in English where required
- Ensure that no Verifier Response is entered when the Verifier Selection is marked as “Accurate,” as this will be flagged during Accredited Host data validation checks.

#### 2.3.2.9 Blank vs “X” Logic

In certain multi-select fields, a blank cell may represent the corrected Verifier Response. Verifiers must ensure that blank cells reflect intentional corrections rather than incomplete entries. Improper formatting (e.g., entering formulas such as “=”) may cause system errors.

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### 3. Practical Guidance for Key Verification Activities

This section provides practical guidance for Verifiers when conducting key verification activities as part of the SLCP verification process. The detailed requirements for these activities are defined in the Verification Protocol (Section 3 – SLCP Onsite Verification Requirements). This section complements the Protocol by providing additional clarification to support Verifiers when reviewing facility information, verifying responses in the Data Collection Tool, and documenting verification findings.

The guidance focuses on selected verification activities where practical interpretation may be helpful to ensure that facility responses are reviewed consistently and that verification findings are clearly documented in the Tool. In practice, Verifiers may encounter situations such as limited or controlled access to records, inconsistencies between different sources of information, or workers who are hesitant to respond. These situations do not change the verification requirements, but require careful judgement, consistent triangulation, and clear documentation in the Tool.

#### 3.1 Reviewing Wages and Working Hours Records

Reviewing wage and working hours records allows the Verifier to confirm whether the information reported in the Self/Joint-Assessment accurately reflects the facility's payment practices and working hours.

The **Verification Protocol** defines the minimum requirements for document sampling and record review. Verifiers must follow these requirements when selecting records and determining the scope of review. When reviewing wages and hours records, Verifiers must select records that represent different operational conditions within the assessment period(12 months). This typically includes pay periods reflecting a **recent pay period, a high production period and a low production period.**

If the facility experienced a production closure or disruption, records from the period during or immediately after the disruption must also be reviewed where relevant.

**NOTE:** For the questions related to average monthly wage data (WB-WAGE-62 to WB-WAGE-75), facilities calculate the average monthly wage for both the lowest and most represented wage grade/level in the facility. The calculation is based on wages paid over the 12-month assessment period, divided by 12 to determine the monthly average. The Verifier should review the underlying payroll records to confirm that the facility's calculation is accurate and that the method used to calculate the average monthly wage can be clearly followed.

#### Examples of Reviewing and Verifying Wages and Hours records

EXAMPLES Reviewing Wage and Hours Records
<p><b>Example 1:</b> If a Facility Response is “Inaccurate - Incorrect” for working hours, <b>the Assessor/Verifier Explanation should be based on the documents the Verifier sampled</b> that showed the inaccuracy. Once the minimum required scope of document review has been completed, the Verifier does not need to continue searching for additional examples unless necessary. However, the <b>Verifier may choose to review additional records</b> to better understand the extent of the issue.</p>
<p><b>Example 2:</b> If the facility reports something that the Verifier did not find in their sample, e.g., the facility reports transparently about overtime hours, but the Verifier does not identify overtime hours worked in the chosen sample, <b>then the Verifier must extend the sample to validate the facility's information.</b> The Verifier not finding overtime, does not necessarily mean that the facility did not have any overtime and the Facility Self/Joint-Assessment Response is Inaccurate - Incorrect. The Verifier must ask the facility to present the records showing overtime so the Verifier can accurately reflect the facility circumstances.</p>

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### 3.2 Verifying Languages Spoken by Workers and Management

In the Facility Profile section of the Tool, **the facility needs to provide the number of languages spoken by supervisors and management to enable them to effectively communicate with all workers.** The question is specifically:

FP-LAN-1: How many languages must be spoken by supervisors and management to effectively communicate with **ALL** workers?

**The Verifier must carefully consider the case of multilingual workers.** If 100% of workers can speak a language fluently (even if that language is not their primary language) the answer is 1, as this is the only language supervisors and management need to speak to communicate with 100% of workers in the facility. See examples below.

EXAMPLES Number of languages spoken by workers
<p><b>Example 1:</b></p> <ul style="list-style-type: none"> <li>- 90% of workers speak only Tamil</li> <li>- 10% of workers speak Hindi and Tamil</li> </ul> <p><b>Answer:</b> One (1) language must be spoken by supervisors and management to effectively communicate with ALL workers since 100% of workers speak Tamil.</p> <p>In this case, supervisors and management need only speak Tamil to be able to effectively communicate with 100% of workers in the facility.</p>
<p><b>Example 2:</b></p> <ul style="list-style-type: none"> <li>- 90% of workers speak only Tamil</li> <li>- 9% of workers speak Hindi and Tamil</li> <li>- 1% of workers speak only Hindi.</li> </ul> <p><b>Answer:</b> Two (2) languages must be spoken by supervisors and management to effectively communicate with ALL workers since 99% of workers speak Tamil and 1% of workers speak Hindi.</p> <p>In this case supervisors and management must speak Tamil and Hindi to be able to effectively communicate with 100% of workers in the facility.</p> <p><a href="#">Return to the top.</a></p>

### 3.3 Handling Facility Concerns During Verification and Closing Meeting

The Verification Protocol requires that Verifiers address any facility concerns raised during the verification or closing meeting within two (2) working days (48 hours) at the end of the onsite verification. During this period, Verifiers must review any additional information provided by the facility and address applicable requests for clarification or edits in a timely manner.

In practice, facilities may request clarification, challenge findings, or provide additional information after the closing meeting. Verifiers must assess any new information objectively and ensure that any updates to the Tool are supported by evidence and remain consistent with verification findings. The 48-hour period may be used in situations where certain information could not be fully reviewed during the onsite verification due to exceptional circumstances.

EXAMPLE  
Addressing Facility Concerns

If a facility is unsure whether it can share a document due to confidentiality concerns, the Verifier may use the 48-hour period after the onsite verification to allow the facility to provide additional information.

During the onsite verification, the Verifier should confirm that the document exists and that the process or practice is being implemented, even if the document cannot be fully reviewed at that time.

### 3.4 Using Triangulation in Verification

The Verification Protocol requires Verifiers to cross-check information from different sources, including documents, interviews, and onsite observations. This approach, referred to as triangulation, helps ensure that verification findings are accurate and reflect actual working conditions.

As explained in the SLCP training “Holistic triangulation to ensure high-quality data” (mandatory for all SLCP Verifiers and available on the [STEP](#) platform), Verifiers are expected to approach the Data Collection Tool holistically. A holistic approach means treating the system as a whole and connecting different pieces of information to form a complete picture of facility practices. In practice, this means that Verifiers must:

- i. **Think about all the topics that relate** (= are interconnected) to the information gathered (e.g., if you identified inaccurate and/or incomplete working hours records, the interconnected topic would be the accuracy of payroll records).
- ii. **Identify all the interconnected data points** in the Data Collection Tool related to the information gathered.  
(For example: *WH-WOR-3- Does the facility maintain only one accurate set of working hour records? YES-Inaccurate-Incorrect is interconnected with WB-WAGE-2 Does the facility maintain only one accurate payroll record? And, with WH-WOR-4-2 Working hour records are consistent with payroll and other records and with WB-WAGE-3-2 Payroll records are consistent with attendance records and other records).*
- iii. **Record the information consistently in the narrative** displayed under all the interconnected data points in the Data Collection Tool.

If the Verifier is unclear on how to use the SLCP Data Collection Tool holistically and how to connect different data to provide a clear picture of a specific situation, SLCP recommends the Verifier refresh their skills by repeating the SLCP training on *Holistic triangulation to ensure high-quality data*.

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## 4. Writing a High-Quality Verified Assessment Report

The Verified Assessment Report is the primary output of the SLCP verification process. While the **Verification Protocol** defines *what* information must be recorded and *when*, this section of the Verifier Guidance focuses on *how* those requirements are applied in practice when completing the Tool. This section does not replace, reinterpret, or restate Protocol requirements. It supports Verifiers by:

- Clarifying expectations where the Protocol refers to additional guidance
- Illustrating good reporting practice through practical, example-based explanations.

The main focus of this section is on report-writing fields that require professional judgment, in particular the **Assessor/Verifier Explanation**. These narratives are critical for transparency, data usability, and consistent interpretation by SLCP data users. Verifiers are encouraged to use this section as a reference and to navigate directly to the subsections and examples most relevant to the questions they are completing.

### 4.1 Assessor/Verifier Selection – how to choose correctly

#### 4.1.1 Purpose

The Assessor/Verifier Selection records the Verifier's professional judgment on the accuracy and completeness of the facility's response for each question in the Tool. This selection is a critical element of the Verified Assessment Report, as it directly affects how data users interpret the results of the verification. The Verification Protocol defines the available selection options and the rules for their application. This subsection does not restate those rules. Instead, it provides practical orientation on how selections are applied in common verification scenarios and how they relate to the supporting narrative in the Assessor/Verifier Explanation. In the Tool, Verifiers interact with a defined set of Assessor/Verifier Selection options. There are six (6) Assessor/Verifier Selection options that the Verifier manually selects, as well as three (3) automated verification options that are applied automatically by the Tool.

#### **Verification Protocol – Section 3.4.3.1**

*Assessor/Verifier Selection must be completed correctly, following the specific rules explained in the column 'Guidance'.*

#### 4.1.2 Guidance Context

In practice, selecting the appropriate Assessor/Verifier option requires the Verifier to assess whether the facility's response is supported by sufficient and reliable evidence gathered during verification activities, such as document review, interviews, and facility observations. The Assessor/Verifier Selection should always be consistent with:

- The evidence reviewed during verification,
- The explanation provided in the Assessor/Verifier Explanation field.

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#### 4.1.3 Scenarios of Assessor/Verifier Selections

Scenarios illustrating when and how specific Assessor/Verifier Selections are applied are provided in this section and referenced **throughout this section**, with additional examples included in the **Report Writing subsections**.

Scenarios: Assessor/Verifier Selections		
<b><u>Inaccurate – Incorrect</u></b>	A facility’s business license is no longer valid, but the facility enters in the information as if still valid.	<p><b>Facility response:</b> Yes</p> <p><b>Verification finding:</b> The business license reviewed during verification is expired.</p> <p><b>Assessor/Verifier Selection:</b> Inaccurate – Incorrect</p> <p><b>Why this selection applies:</b> The response is factually incorrect, as the business license is expired and was not valid during the assessment period.</p>
<b>Inaccurate – Misunderstanding</b>	A facility did not understand the meaning of casual worker ( <b>note</b> , definitions and data point clarifications are available in the Tool’s “More Info” section).	<p><b>Facility response:</b> The facility reports that it does not employ any casual workers.</p> <p><b>Verification finding:</b> During verification, it was found that the facility engages workers on a daily/short-term basis without ongoing contracts, meeting the SLCP definition of casual workers.</p> <p><b>Assessor/Verifier Selection:</b> Inaccurate – Misunderstanding</p> <p><b>Why this selection applies:</b> The response is inaccurate due to a misunderstanding of “casual worker.” Although definitions are provided in the Tool’s “More Info” section, they were not correctly applied.</p>
<b>Not visible to facility during SA/JA</b>	The facility did not provide a response to this question during the self-/joint-assessment because, based on the information originally provided by the facility, the question was not visible at that stage.	<p><b>Facility response:</b> Blank/No response</p> <p><b>Verification finding:</b> Based on the original Facility Profile, this question was not shown during the self-/joint-assessment. Updated information during verification made it available.</p> <p><b>Assessor/Verifier Selection:</b> Not visible to facility during SA/JA – automatically applied by the Tool</p> <p><b>Why this selection applies:</b> The facility could not answer this question during the self-/joint-assessment as it only became visible during verification after the Verifier made a correction to the self-assessment data.</p>
<b>Updated during Verification</b>	Facility Profile information changed after the self-/joint-assessment and required updating during verification.	<p><b>Facility response:</b> Number of production buildings: 3</p> <p><b>Verification finding:</b> An additional production building was identified; operational at the time of verification but not operational while the facility completed the self-assessment.</p> <p><b>Assessor/Verifier Selection:</b> Updated during Verification</p> <p><b>Why this selection applies:</b> The Facility Profile changed since the self-/joint-assessment. The additional building was identified during verification and reflects current conditions, It is not an inaccuracy if the original self-assessment response was correct at the time.</p>

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## 4.2 Assessor/Verifier Explanation – purpose and expectations

### 4.2.1 Context and Purpose

The Assessor/Verifier Explanation is a core component of the verified assessment report. Together with the Assessor/Verifier Selection and Assessor/Verifier Response, it allows users of SLCP data to understand the verified situation at the facility and to make informed decisions related to compliance, grading, certification, remediation, and follow-up actions.

While the Assessor/Verifier Selection indicates what conclusion the Verifier reached, the Assessor/Verifier Explanation explains why that conclusion was reached, based on the evidence reviewed during verification activities. This narrative provides transparency on the Verifier's professional judgment and ensures that verified data remains meaningful and usable for stakeholders who were not present during the assessment. The Verification Protocol defines **when** the Assessor/Verifier Explanation is mandatory and **what minimum information** must be included. This Guidance does not replace or reinterpret those requirements; its purpose is to support Verifiers in applying them consistently and clearly when completing the Tool.

#### Box 3: When must Verifiers Complete the Assessor/Verifier Explanation?

**The Verification Protocol (Sections 3.4.4.1, 3.4.4.2)** defines when an Assessor/Verifier Explanation is required and the minimum information it must contain. Verifiers must complete the Assessor/Verifier Explanation whenever it is required by the Protocol. In practice, this occurs in the following situations:

1. **Mandatory Tool Questions:** For the **179 Tool Question Keys** identified in the Appendix where an Assessor/Verifier Explanation is mandatory.
2. **Selections that require explanation:** When the **Assessor/Verifier Selection requires clarification of the verified situation**, for example: *Inaccurate – Incorrect, Inaccurate – Misunderstanding, Updated during Verification, Not visible to facility during SA/JA, Facility did not reply during SA/JA*, or similar cases described in the Verification Protocol.
3. **Legal Non-Compliance:** Whenever **Non-Compliance is identified and a Legal Reference is recorded**, the explanation must describe the verified situation and explain how it results in a breach of applicable legal requirements.

### 4.2.2 Narrative Requirements and Automated Data Quality Checks (VRQ Checks)

The Assessor/Verifier Explanation plays a critical role in ensuring that verified data is transparent, consistent, and usable. While the Verification Protocol defines when an explanation is mandatory and what minimum information must be included, this Guidance explains how those requirements can be applied in practice when completing the Tool. The Assessor/Verifier Explanation field is reviewed through **Automated Data Quality Checks (VRQ Checks)** and additional **SLCP internal data quality checks (Desktop Review)**. These checks help ensure that required explanations are present and meet the minimum structural requirements defined by the system.

SLCP reviews the Assessor/Verifier Explanation field through two complementary layers of data quality checks. First, **Automated Data Quality Checks (VRQ Checks)** verify the existence of the narrative and whether it meets the minimum structural requirements defined by the system. Second, **SLCP Desktop Reviews** assess the quality, relevance, and coherence of the explanation to ensure that it clearly explains what was verified, how it was verified, and why the Assessor/Verifier Selection applies. While VRQ Checks confirm that the required structural elements are present, Desktop Reviews evaluate whether the narrative provides sufficient clarity and context for SLCP data users.

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**Box 4: Automated Data Quality Check (VRQ Check) – Assessor/Verifier Explanations**

For Assessor/Verifier Explanation fields that are subject to automated checks, the system verifies the **existence** and **minimum structure** of the narrative. **To pass Automated Data Quality Checks**, the Assessor/Verifier Explanation:

- **Must not be left blank** when required by the Verification Protocol (**including the 179 Tool Keys** and any other questions where an Assessor/Verifier Explanation is mandatory or required due to Assessor/Verifier Selection, as per Protocol)
- **Include a clearly stated reason**, introduced using the exact word with a colon **“Reason:”**. The use of **“Reason:”** (with a colon) is required, as the system checks for this text.
- **Include at least one recognized source of information**, introduced separately using at least one of the following exact terms, not case sensitive: **“Facility Walkthrough”**, **“Worker Interview”**, **“Management Interview”**, or **“Documentation Review”**. At least one recognized source is mandatory. Additional sources may be included where relevant.

**Important:** Missing any of the above mandatory structural elements will result in VRQ errors and trigger a Corrective Action Request (CAR). Even when VRQ requirements are met, explanations may still not pass SLCP internal data quality checks (e.g. Desktop Reviews) if they do not clearly describe the verification process and the basis for the Assessor/Verifier Selection. Please refer to Section 4.2.4 for examples.

**4.2.3 What a Good Assessor/Verifier Explanation Must Contain**

The table below explains how to apply existing Protocol requirements **in practice** when writing the Assessor/Verifier Explanation. These elements support clear reporting and help ensure explanations meet SLCP automated checks and are understandable for SLCP customers.

Guidance element	What to include	Practical guidance
<b>Reason: for the Assessor/Verifier Selection</b>	A clear explanation of why the specific selection applies	Explain how the evidence reviewed supports the Assessor/Verifier Selection. The reader should clearly understand why the facility response was assessed as accurate, inaccurate, misunderstood, updated during verification, or otherwise. Where applicable, clearly describe why the verified situation is not in line with applicable legal requirements and how this resulted in a Non-Compliance.
<b>Source(s) of evidence used</b>	How the information was verified	Reference at least <b>one verification source</b> using recognized terms ( <b>Facility Walkthrough, Worker Interview, Management Interview, Documentation Review</b> ). The source(s) cited should reflect <b>how</b> the information was verified in practice and <b>be relevant to the question being assessed</b> .

<b>Relevant context about the verified situation</b>	Information needed to understand the situation	Where applicable, include scope, affected workers, location, department, process, or timeframe. Focus on what is necessary to understand the verified situation.
<b>Different processes within the facility (if applicable)</b>	Clarification where practices differ	Where different processes apply across worker groups, departments, or facility areas, describe each clearly and explain how this led to the Assessor/Verifier Selection. Use the explanation to clarify why a single response does not fully represent the verified situation.
<b>Consistency across the report</b>	Alignment with related questions	Ensure the explanation is consistent with the Assessor/Verifier Selection, Assessor/Verifier Response, and information recorded for interconnected questions.
<b>Evidence Triangulation</b>	Use of multiple verification sources where possible	Wherever possible, Verifiers should triangulate evidence using multiple sources (e.g., document review, worker interviews, and facility observations) to support the conclusion recorded.
<b>Minimum structural requirements</b>	Minimum structural requirements	The Assessor/Verifier Explanation field <b>must not be left blank</b> when required by the Verification Protocol. The explanation must clearly state the <b>Reason</b> using the exact word with a colon “Reason” and reference <b>at least one verification source</b> using specific terms so that it passes the automated checks.
<b>Supporting attachments (if applicable)</b>	Use of photos or documents as supporting evidence	Supporting attachments (photos or documents) may be uploaded through the Accredited Host platform where relevant; however, attachments must support — not replace — the written explanation.
<b>What to avoid</b>	Common reporting mistakes	Avoid opinions, assumptions, recommendations, restating the question, or copying facility statements without verification. Include only factual, evidence-based information.

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#### 4.2.4 Good Examples of Assessor/Verifier Explanation

The examples below illustrate how the Assessor/Verifier Explanation can be written in line with Protocol requirements. These examples are illustrative and not templates; Verifiers may adapt wording to reflect actual facility circumstances. Specific terms/ words to use are highlighted in **bold** but they do not have to be bold in when entered on the Accredited Host platform or in the offline Excel Tool. The VRQ Checks are neither case nor font sensitive.

Good Examples - Assessor/Verifier Explanation			
Verifier Selection	Question #/Facility response/Scenario	Assessor/Verifier Explanation	Remarks
Accurate	<p><b>HS-EME-9</b> – Does the facility regularly test and service fire extinguishers in line with legal requirements?  <b>Facility/response:</b> Yes                      Verifier assessed that the facility response is Accurate.</p>	<p><b>Reason:</b> The facility response is accurate because, testing and servicing is in line with the legal requirement.                      It was confirmed during <b>Documentation Review</b> that the inspection records are up to date and testing is conducted every 6 months. The most recent inspection was conducted on 01-01-2026 and in line with applicable legal requirements.</p>	
Accurate	<p><b>HS-EME-9</b> – Does the facility regularly test and service fire extinguishers in line with legal requirements?  <b>Facility response:</b> No applicable legal requirements                      Verifier assessed that the facility response is Accurate. No applicable legal requirements</p>	<p><b>Reason:</b> There are no applicable legal requirements in the country of operation specifying mandatory testing and servicing of fire extinguishers.                      It was confirmed during <b>Management Interview</b> and <b>Documentation Review</b> that the national labor law does not define specific testing or servicing intervals. The facility nevertheless conducts checks every 6 months as part of its internal safety procedures.</p>	
Accurate	<p><b>RH-REC-7</b> – Are recruitment fees and related costs paid by workers in line with legal requirements?  <b>Facility Response:</b> No                      Verifier Selection is Accurate and Non-Compliance: Selected                      This example illustrates how Legal Non-Compliance may be identified regardless of whether the facility response is assessed as <b>Accurate or Inaccurate</b>.</p>	<p><b>Reason:</b> The response is accurate. Workers pay recruitment agency fees, which is not in line with legal requirements.  <b>Documentation Review</b> of employment contracts and payment receipts confirmed that 42 migrant workers paid agency fees equivalent to one month’s salary prior to employment. <b>Worker Interview</b> confirmed that these fees were not reimbursed. <b>Management Interview</b> confirmed that the facility does not reimburse recruitment-related costs paid by workers to third-party agencies. Therefore, this practice constitutes a legal Non-Compliance.</p>	<p><b>Non-compliance:</b> X  <b>Legal Reference:</b>                      Under Section 18 of the XYZ country Labour Recruitment Regulation 2025, employers and recruitment agencies are prohibited from</p>

			charging recruitment fees or related costs to workers.
<b>Inaccurate – Misunderstanding</b>	<p><b>HS-GEN-31</b> – Are workers allowed access to toilets/restrooms at any time?</p> <p><b>Facility response:</b> Yes</p> <p>Verifier assessed that the facility response is Inaccurate-Misunderstanding as the facility misunderstood the question.</p>	<p><b>Reason:</b> The response is inaccurate due to a misunderstanding of the requirement. Management interpreted “at any time” as access with permission, which restricts access and does not meet the intent of unrestricted use.</p> <p><b>Facility Walkthrough</b> and <b>Worker Interview</b>, confirmed that workers must obtain supervisor permission during peak hours; 25 out of <b>30 workers</b> reported this.</p>	
<b>Inaccurate – Incorrect</b>	<p><b>WH-WOR-3</b> – Does the facility maintain only one accurate set of working hour records?</p> <p><b>Facility response:</b> Yes</p> <p>Verifier assessed that the facility response is Inaccurate-Incorrect as the intent was not to show the double sets of records.</p>	<p><b>Reason:</b> The response is inaccurate, because while one attendance record is maintained for regular hours and legal overtime, a separate record tracks overtime exceeding legal limits. As a result, there is no single accurate record of all hours worked. This was confirmed through <b>Documentation Review</b> of attendance and overtime records, <b>Worker Interview</b>, and <b>Management Interview</b>, which explained that overtime is recorded separately. A total of 250 workers performed excessive overtime, with records maintained separately.</p>	<p><i>Likely a non-compliance would apply.</i></p> <p><i>Non-compliance: X</i></p> <p><i>Legal reference: XXX</i></p>
<b>Inaccurate – Incorrect</b>	<p><b>WH-OVE-3</b> – Does the facility consult with workers and/or notify them in advance about overtime work and/or changes in rest days in line with legal requirements?</p> <p><b>Facility response:</b> No applicable legal requirements</p> <p>Facility unaware of legal requirement. There is a legal non-compliance.</p>	<p><b>Reason:</b> The response is inaccurate because the facility stated “No applicable legal requirements,” while applicable legal requirements do exist. The Verifier found rest day working and overtime working in the facility, as evidenced by attendance records. However, workers were not informed or consulted/notified in advance regarding overtime or rest day changes. This indicates that the facility is not aware of the applicable legal requirements. This was confirmed through <b>Documentation Review</b> of attendance records, <b>Worker Interview</b>, where workers stated they were not informed in advance, and <b>Management Interview</b>, where management confirmed no awareness of such legal obligations.</p>	<p><i>Non-compliance would apply.</i></p> <p><i>Non-compliance: X</i></p> <p><i>Legal reference: XXX</i></p>
<b>Inaccurate – Incorrect</b>	<p><b>WH-OVE-1</b> – Is overtime voluntary, in line with legal requirements?</p>	<p><b>Reason:</b> The facility response is inaccurate because overtime is not voluntary in practice. Workers who refuse</p>	<p><b>Non-compliance: X</b></p>

	<p><b>Facility response:</b> Yes Verifier assessed that the facility response is Inaccurate – Incorrect as the verified practice does not reflect voluntary overtime and is not in line with applicable legal requirements.</p> <p><b>This example illustrates how a Legal Non-Compliance may be identified where the facility response is assessed as Inaccurate – Incorrect.</b></p>	<p>overtime are subject to adverse consequences, which does not meet the legal requirement for free and informed consent.</p> <p><b>Worker Interview</b> (18 out of 25 workers) confirmed that refusal of overtime results in verbal warnings and reassignment to less favourable production lines.</p> <p><b>Documentation Review</b> of attendance records confirmed that overtime hours were consistently recorded for workers who stated they did not consent. <b>Management Interview</b> confirmed that overtime participation is expected during peak production periods.</p>	<p><b>Legal reference:</b> Article 62 of the XYZ country Labor Law 2025 requires that overtime be performed only with the worker’s free and informed consent.</p>
<p><b>Inaccurate – Incorrect</b></p>	<p><b>HS-GEN-31 – Are workers allowed access to toilets/restrooms at any time?</b></p> <p><b>Facility response:</b> Yes Verifier assessed that the facility response is Inaccurate – Incorrect as workers do not have unrestricted access to toilets during working hours.</p> <p><b>This example illustrates that even where a question does not explicitly refer to legal compliance, a Legal Non-Compliance may still be identified if the verified practice breaches applicable local law.</b></p>	<p><b>Reason:</b> The facility response is inaccurate because workers are required to obtain permission from supervisors before using the toilets during production hours.</p> <p><b>Worker Interview</b> (20 out of 28 workers) confirmed that they must ask for approval before leaving the production line, and some workers stated they were asked to wait until production targets were met. <b>Facility Walkthrough</b> confirmed that supervisors control movement from the production area. <b>Management Interview</b> confirmed that permission is required during peak production periods. Because access is restricted in practice, this constitutes a legal Non-Compliance.</p>	<p><b>Non-Compliance:</b> X</p> <p><b>Legal reference:</b> Section 32 of the XYZ country Occupational Safety and Health Act 2025 requires that workers have free and unrestricted access to sanitary facilities during working hours.</p>

<p><b>Updated during Verification</b></p>	<p><b>FP-BUI-2</b> – Facility Profile – Number of production buildings onsite  <b>Facility response:</b> The facility reported 3 production buildings during the self-/joint-assessment.                  During verification, an additional production building was identified that was only operational at the time of verification but did not exist at time of self-assessment.</p>	<p><b>Reason:</b> The facility’s circumstances have changed since the self-/joint-assessment.                  During the <b>Facility Walkthrough</b> and <b>Management Interview</b>, the Verifier identified an additional production building that was in operation at the time of verification but not during the self-assessment period.</p>	
<p><b>Facility did not reply during SA/JA</b></p>	<p><b>HS-EME-14</b> – Are all emergency exits clearly marked?  <b>Facility response:</b> No response provided                  Automatically applied Assessor/Verifier Selection: Facility did not reply during SA/JA</p>	<p><b>Reason:</b> The facility did not provide a response to this question during the self-/joint-assessment because construction work was ongoing around emergency exit areas, and the facility was unsure whether the emergency exit signage would be completed at that stage.                  During verification, the emergency exit signage was reviewed through a <b>Facility Walkthrough</b>. Exit markings were observed to be present for all the 10 exit doors and clearly visible.</p>	
<p><b>Not visible to facility during SA/JA</b></p>	<p><b>RH-CHI-21</b> – Have there been any incidences of forced labor, including sale and trafficking, prostitution, pornography, or illegal activities involving workers under age 18, or work that exposes them to physical, psychological, or sexual abuse?  <b>Facility response:</b> Not provided (question not visible during SA/JA).                  Automatically applied Assessor/Verifier Selection: Not visible to facility during SA/JA</p>	<p><b>Reason:</b> The facility did not see this question because they inaccurately reported 0 workers under the age of 18. It was confirmed through <b>Documentation Review</b>, <b>Worker Interview</b>, and <b>Management Interview</b>, that there are no incidences of forced labor or related risks. Two young workers were identified; age documents were verified, and interviews confirmed they performed only light helper duties under normal conditions, with no abusive or hazardous practices.</p>	

<p><b>Not applicable due to special facility circumstances</b></p>	<p><b>WB-WAGE-83</b> – Number of female workers who were promoted with an increase in their basic wage as a result of their promotion: <b>Facility response:</b> 0 Verifier assessed that the selection is Not applicable due to special facility circumstances</p>	<p><b>Reason:</b> This question is not applicable due to special facility circumstances, because the facility has no female workers. During <b>Management Interview</b> Verifier confirmed that although the answer is factually correct by the facility, it would be more appropriate to highlight the special circumstances to the report reader, so the data is not misinterpreted.</p>	
<p><b>No longer applicable due to verification</b></p>	<p><b>RH-REC-2</b> – Are any monetary deposits required of workers? This is a conditional question that appears only when RH-REC-1 is answered “No applicable legal requirements.” During the self-assessment, the facility selected “No applicable legal requirements” for RH-REC-1, which resulted in RH-REC-2 becoming visible in the Tool.  Verifier assessed RH-REC-1 as Inaccurate-Incorrect and entered “No” as the response, which results in automatic application of Assessor Verifier Selection for RH-REC-2: No longer applicable due to verification.  <i>This example shows that even for one of the 179 keys where Explanation is mandatory, verification may confirm that a question is no longer applicable and this must be clearly explained.</i></p>	<p><b>Reason:</b> The previous question was answered inaccurately. The facility is in line with legal requirements, which makes this question no longer applicable. <b>Management Interview</b> and <b>Worker Interview</b> confirm that the facility is not requiring any monetary deposits.</p>	
<p><b>Verification not required</b></p>	<p><b>Verification not required</b> is the only selection the Verifier can make/ no other selection options are available. Verifiers may leave comments where helpful, but an explanation is not required.</p>		

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#### 4.2.5 Bad Examples of Assessor/Verifier Explanation

The **bad examples** below illustrate common reporting mistakes. Each example explains why it fails VRQ Check requirements and/or SLCP internal check criteria. These explanations will trigger a Corrective Action Request (CAR).

Bad Examples - Assessor/Verifier Explanation			
Verifier Selection	Question #/Facility response/Scenario	Assessor/Verifier Explanation	Why this example fails
Accurate	<p><b>HS-EME-9</b> – Does the facility regularly test and service fire extinguishers in line with legal requirements?  <b>Facility response:</b> Yes                      Verifier assessed that the facility response is Accurate.</p>	<p><b>Reason</b> The facility response was considered accurate based on the general fire safety practices observed during the visit.                      During verification, fire extinguishers were observed in various locations across the facility and appeared to be in usable condition. Management indicated that fire safety equipment is maintained as part of routine safety procedures, Based on these observations and discussions, the facility response was assessed as accurate.</p>	<ul style="list-style-type: none"> <li>Reason not clearly identified and “:” missing</li> <li>No recognized source terms used</li> <li>Focuses on presence, not testing or servicing</li> <li>Legal compliance not demonstrated</li> <li>Lacks verifiable detail</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
Accurate	<p><b>RH-REC-7</b> – Are recruitment fees and related costs paid by workers in line with legal requirements?  <b>Facility Response:</b> No                      Verifier Selection is Accurate and Non-Compliance: Selected                      This example illustrate how Legal Non-Compliance may be identified regardless of whether the facility response is assessed as <b>Accurate or Inaccurate</b>.</p>	<p><b>Reason:</b> The facility response is accurate because workers’ pay recruitment fees that are not in line with legal requirements.  <b>Worker Interview</b> confirmed that some migrant workers paid recruitment-related costs before employment. <b>Management Interview</b> confirmed that recruitment is managed by external agencies.  <b>Documentation Review</b> was conducted. This constitutes a legal non-compliance.</p>	<ul style="list-style-type: none"> <li>Legal requirement not clearly identified</li> <li>Does not explain how the verified facts breach the law</li> <li>Evidence cited is vague and not linked to the conclusion</li> <li>Scope of the issue not described</li> </ul> <p>Passes Automated Data Quality Check                      Fails Desktop Review; does not provide sufficient clarity for report readers</p>

<p><b>Inaccurate – Misunderstanding</b></p>	<p><b>HS-GEN-31</b> – Are workers allowed access to toilets/restrooms at any time? <b>Facility response:</b> Yes Verifier assessed that the facility response is Inaccurate as the facility Misunderstood the question.</p>	<p>Workers can use the toilets in the facility, and the restrooms are available on each production floor. Management stated that workers can generally access the toilets when required and that supervisors are informed if a worker needs to leave the production line. Workers mentioned that restroom use is usually allowed. Toilet access is considered part of normal factory practice, and the facility therefore indicated that workers are allowed access at any time.</p>	<ul style="list-style-type: none"> <li>• No clear Reason provided</li> <li>• “Reason:” not part of narrative</li> <li>• Misunderstanding not explained</li> <li>• No recognized source terms used</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>Inaccurate – Incorrect</b></p>	<p><b>WH-WOR-3</b> – Does the facility maintain only one accurate set of working hour records? <b>Facility response:</b> Yes Verifier assessed that the facility response is Inaccurate-Incorrect as the intent was not to show the double sets of records.</p>	<p><b>Reason:</b> The facility response is inaccurate because, although one attendance record is maintained for normal working hours and legally permitted overtime, a separate overtime record is used to track overtime hours exceeding the legal limit.</p>	<ul style="list-style-type: none"> <li>• Does not clearly explain how records were verified</li> <li>• No recognized source terms used</li> <li>• Scope and impact of the double records not explained</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>Inaccurate – Incorrect</b></p>	<p><b>WH-OVE-1</b> – Is overtime voluntary, in line with legal requirements? <b>Facility response:</b> Yes Verifier assessed that the facility response is Inaccurate – Incorrect as the verified practice does not reflect voluntary overtime and is not in line with applicable legal requirements. <b>This example illustrates how a Legal Non-Compliance may be identified where the facility response is assessed as Inaccurate – Incorrect.</b></p>	<p>The facility response is inaccurate because overtime is not fully voluntary and does not comply with legal requirements. Workers confirmed that workers usually perform overtime when required. HR staffs stated that overtime is necessary to meet production deadlines. Therefore, this is a legal non-compliance.</p>	<ul style="list-style-type: none"> <li>• Missing required “Reason:” statement</li> <li>• No recognized verification source term used</li> <li>• Legal requirement not identified</li> <li>• Evidence not explained</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>Inaccurate – Incorrect</b></p>	<p><b>HS-GEN-31</b> – Are workers allowed access to toilets/restrooms at any time? <b>Facility response:</b> Yes</p>	<p><b>Reason:</b> Workers are not always allowed to use the toilets freely and this is not compliant with the law.</p>	<ul style="list-style-type: none"> <li>• Does not clearly explain what the law requires</li> <li>• Does not describe how the practice breaks the law</li> </ul>

	<p>Verifier assessed that the facility response is Inaccurate – Incorrect as workers do not have unrestricted access to toilets during working hours.</p> <p><b>This example illustrates that even where a question does not explicitly refer to legal compliance, a Legal Non-Compliance may still be identified if the verified practice breaches applicable local law.</b></p>	<p><b>Worker Interview</b> confirmed that permission is sometimes required. <b>Management Interview</b> was conducted. This is a legal non-compliance.</p>	<ul style="list-style-type: none"> <li>Evidence is vague (“sometimes required”)</li> <li>No clear link between facts and legal conclusion</li> </ul> <p>Passes Automated Data Quality Check Fails Desktop Review; does not provide sufficient clarity for report readers</p>
<p><b>Updated during Verification</b></p>	<p><b>FP-BUI-2</b> – Facility Profile – Number of production buildings onsite <b>Facility response:</b> 3</p> <p>The facility reported 3 production buildings during the self-/joint-assessment. During verification, an additional production building was identified that was only operational at the time of verification but did not exist at time of self-assessment.</p>	<p>This information was updated during verification as needed. It was noticed that the Dormitories were situated outside the facility premises.</p>	<ul style="list-style-type: none"> <li>Reason for the update not clearly stated</li> <li>Explanation includes irrelevant information</li> <li>Verification basis for identifying the additional building not explained</li> <li>No recognized source terms used</li> <li>Word ‘Reason’ and the colon [:] missing</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>Facility did not reply during SA/JA</b></p>	<p><b>HS-EME-14</b> – Are all emergency exits clearly marked? <b>Facility response:</b> No response provided. Automatically applied Assessor/Verifier Selection: Facility did not reply during SA/JA</p>	<p>Emergency exits were observed during the site visit and were generally visible in the production areas. Exit signage was present in most locations, and management stated that emergency exits are part of the facility’s safety arrangements. This was confirmed during a <b>Facility Walkthrough</b>.</p>	<ul style="list-style-type: none"> <li>No clear “Reason:” explaining why the facility did not reply during SA/JA</li> <li>Focuses on verification findings instead of the facility’s non-response</li> <li>Includes a source but does not justify the selection</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>

<p><b>Not visible to facility during SA/JA</b></p>	<p><b>RH-CHI-21</b> – Have there been any incidences of forced labor, including sale and trafficking, prostitution, pornography, or illegal activities involving workers under age 18, or work that exposes them to physical, psychological, or sexual abuse? <b>Facility response:</b> Not provided (not visible during SA/JA). Assessor/Verifier Selection: Auto-applied and not visible to the facility.</p>	<p><b>Reason:</b> The question was not visible to the facility during the self-assessment stage. During verification, emergency exits in production areas were clearly marked and unobstructed. Fire safety signage was visible, management confirmed regular reviews of emergency preparedness, and workers were aware of evacuation routes and procedures.</p>	<ul style="list-style-type: none"> <li>Reason is disconnected from the topic of the question</li> <li>Explanation is unrelated to forced labor or young workers</li> <li>Does not address the situation or findings relevant to RH-CHI-21</li> <li>No recognized source term used</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>Not applicable due to special facility circumstances</b></p>	<p><b>WB-WAGE-83</b> – Number of female workers who were promoted with an increase in their basic wage as a result of their promotion: <b>Facility response:</b> 0 Verifier assessed that the selection is Not applicable due to special facility circumstances</p>	<p><b>Reason:</b> Not applicable based on the facility workforce situation and current practices.</p>	<ul style="list-style-type: none"> <li>Reason is generic and does not explain the facility's specific circumstance</li> <li>Explanation remains vague and does not specify the actual situation (no female workers)</li> <li>No recognized source term is used, and it does not explain how the verifier confirmed the situation</li> </ul> <p>Fails both VRQ automated checks and the Desktop Review</p>
<p><b>No longer applicable due to verification</b></p>	<p><b>RH-REC-2</b> – Are any monetary deposits required of workers? This is a conditional question that appears only when RH-REC-1 is answered “No applicable legal requirements.” During the self-assessment, the facility selected this option, which made RH-REC-2 visible in the Tool. The Verifier assessed RH-REC-1 as Inaccurate–Incorrect and changed the response to “No,” which automatically results in RH-REC-2 being marked as “No longer applicable due to verification.”</p>	<p><b>Reason:</b> The question is no longer applicable based on the information reviewed during verification. During verification, a <b>Management Interview</b> was conducted to understand recruitment practices. Management explained that arrangements vary by worker category and location, and that deposits are generally not required. Based on this discussion and available information at the time, the question was assessed as no longer applicable.</p>	<ul style="list-style-type: none"> <li>Reason does not explain why the question became no longer applicable due to verification</li> <li>Does not clearly explain what changed between assessment and verification</li> <li>Uses a source but provides no concrete verification outcome</li> </ul> <p>Passes Automated Data Quality Check Fails Desktop Review; does not provide sufficient clarity for report readers</p>

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### 4.3 Non-Compliance and Legal Reference – how to explain clearly

This section explains how Verifiers must identify, record, and explain **Non-Compliances** and **Legal References** so that verified assessment reports are accurate, compliant with the Protocol, pass system checks, and are usable by report readers. This guidance focuses on **how to clearly explain Non-Compliance**, not on legal interpretation or legal drafting.

#### **Verification Protocol – Section 3.4.4.2**

*If the facility circumstances are not in compliance with applicable legal requirements, then the Verifier must select “Non-Compliance”, provide Legal Reference and details for the non-compliance in Assessor/Verifier Explanation*

The obligation to select “Non-Compliance” applies whenever the verified facility circumstances are not in line with applicable legal requirements. This applies regardless of how the Tool question is phrased. If a **legal non-compliance** is identified and the Tool allows selection of Non-Compliance and entry of a **Legal Reference**, both must be applied. This applies even if the question does not explicitly refer to legal requirements or is not framed as a legal compliance question. The obligation to cite the law depends on the existence of a legal breach and whether the Tool allows entry of Non-Compliance and Legal Reference, not on the wording of the question.

#### 4.3.1 Meaning of “Consult applicable legal requirements”

##### **Box 5: What “Non-Compliance” means in SLCP**

- SLCP assesses compliance only against legal and regulatory frameworks.
- SLCP does not assess compliance against Codes of Conduct or voluntary standards.
- An SLCP Non-Compliance refers to any situation where verified facility practices are not in line with: applicable national law, and/or applicable International Labour Standards (ILS).
- When a country has ratified an ILO convention, that convention establishes the foundation for national law and practice.
- National law may be more specific than ILO conventions, reflecting country- or region-specific requirements.
- If no applicable national regulation exists, the ILO [Fundamental Principles and Rights at Work](#) apply, even if the country has not ratified the relevant conventions.
- Where both national law and ratified ILO conventions apply, the stricter requirement prevails.
- Whenever the term “Non-Compliance” is used within the CAF (including Verifier and facility guidance and protocols), it refers to non-compliance with: applicable national law, and/or applicable International Labour Standards, including the Fundamental Principles and Rights at Work.
- Any identified Non-Compliance - regardless of the Assessor/Verifier Selection - will be reflected in the Verification Summary.

**Important!** When a Non-Compliance is identified, the Verifier must check the “**Non-Compliance**” column and fill out the applicable legal requirement in the “**Legal Reference**” column.

If a Tool question references legal compliance (for example, “In line with legal requirements” or “legally required”), the facility and the Verifier must assess the response against **applicable legal requirements**. Where no national legal requirement exists, the Tool’s “More Info” guidance should be followed. [Return to the top.](#)

**Applicable legal requirements that Verifiers must consider include the following:**

Category	What this includes
International Labor Standards (baseline)	<a href="#">ILO Fundamental Principles and Rights at Work</a> (ILO Core Conventions)
Child Labor	C138 Minimum Age Convention (1973); C182 Worst Forms of Child Labour Convention (1999)
Discrimination	C100 Equal Remuneration Convention (1951); C111 Discrimination (Employment and Occupation) Convention (1958)
Forced Labor	C29 Forced Labour Convention (1930, incl. Protocol); C105 Abolition of Forced Labour Convention (1957)
Freedom of Association & Collective Bargaining	C87 Freedom of Association and Protection of the Right to Organize Convention (1948); C98 Right to Organize and Collective Bargaining Convention (1949)
Occupational Safety and Health (OSH)	C155 Occupational Safety and Health Convention (1981)
Other ILO conventions	Other conventions ratified and in force in the country of operation
National legal framework	Laws and regulations applicable in the jurisdiction
Collective agreements	Collective bargaining agreements, where provisions are at least as favourable to workers as legal requirements

**4.3.2 Law Overlay and Automated Entry of Non-Compliance and Legal Reference**

The [Law Overlay](#) provided by Better Work for select countries, applies only to Step 1 questions. Country-specific legal information is available on the Accredited Host platform as “Law Guidance” attached to relevant questions, and can be accessed by both facilities and Verifiers, similar to the “More Info” section.

For offline use, an Excel file is available with applicable legal guidance by country and Tool question. In the offline Tool, minor information on laws appears only in Section and Sub-Section Instructions and generally refers to international labor standards rather than country-specific laws.

The Law Overlay supports consistent use of legal references where available but does not replace the Verifier’s responsibility to identify and record Non-Compliance whenever a legal breach exists and the Tool allows it.

**How the Law Overlay Works**

**The Law Overlay** = Law Guidance and the automated application of the law information depending on the Verifier’s actions. The Law Overlay combines:

- Law Guidance provided by Better Work, and
- Automated application of legal information based on the Verifier’s Final Response in the Tool.

Final Response means the facility Self/Joint-Assessment response if the Assessor/Verifier Selection is “Accurate” or it is the Assessor/Verifier Response. Once the Final Response has been determined, the Accredited Host will automatically:

- Select Non-Compliance, and
- Complete the Legal Reference narrative as per Better Work—provided information, where Law Guidance exists and the Final Response results in a Non-Compliance.

**For Step 1 questions with Law Guidance, the Verifier does not need to independently determine whether the facility circumstance is not in compliance with applicable legal requirements. The system will automatically do this,** supporting consistent application of non-compliances and legal references and improving report quality.

#### **Box 6: Verifier responsibilities and limitations**

- Law Overlay is not available for all countries or all questions.
- Verifiers remain responsible for identifying and documenting any legal non-compliance not covered by the Law Overlay.
- If applicable legislation does not sufficiently address an issue related to compensation, contracts, occupational safety and health, or working time, other benchmarks may be used, provided they are:
  - derived from international ILO instruments, and
  - developed within the ILO and in consultation with tripartite constituents.

If a practice is not legally required, but the facility nevertheless implements it (for example, breastfeeding breaks), the Verifier must:

- Select “No applicable legal requirements”, and
- Explain in the Assessor/Verifier Explanation that the facility addresses the issue despite the absence of a legal requirement.

#### **Important – offline use and overrides**

- When Law Overlay is enabled, any Non-Compliance or Legal Reference entered in the offline Tool may be overwritten once the Tool is uploaded to the Accredited Host platform. This is a system limitation related to offline-to-online data transfer.
- The Verifier may override the automatically completed Non-Compliance or Legal Reference, though this is expected to be rare.
- Any override of the Law Overlay must be clearly explained in the Assessor/Verifier Explanation.

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### **4.3.3 Application of Legal Non-Compliance in Practice**

Non-Compliance must be selected and a Legal Reference provided whenever a verified situation is not compliant with applicable law for questions that refer to “in line with legal requirements” or “legally required.” However, this obligation is not limited to such questions, as some operational or factual questions may also reveal a breach of applicable national law or International Labor Standards. If a legal breach is identified, and the Tool enables entry of Non-Compliance and Legal Reference for that question, the Verifier must apply both. The requirement to cite legal Non-Compliance depends on:

- whether a legal breach exists, and
- whether the Tool allows entry of Non-Compliance and Legal Reference

It does not depend solely on how the question is phrased. In summary, whenever a verified situation is not compliant with applicable law, and the Tool allows it, the Verifier must select Non-Compliance and complete the Legal Reference, regardless of how the question is written.

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QUESTION	MORE INFO
<b>EXAMPLES</b> Legal Compliance Questions (Explicitly Referencing Legal Requirements)	
<b>1. RH-REC-7: Are recruitment fees and related costs paid by workers <u>in line with legal requirements</u>?</b>	<p>The intent of this question is to understand that when workers pay any recruitment fees or related costs, the fees/costs are line with legal requirements (i.e., fee amounts or types of fees). If workers first had to pay for fees or costs before receiving reimbursement, consider whether this was <b>in line with legal requirements</b>.</p>
<b>2. HS-EME-3: Does the facility have a fire detection and alarm system in line with legal requirements?</b>	<p>The purpose of a fire detection and alarm system is for early detection and reporting, so as to reduce the time needed to implement fire-fighting measures and to limit the impact of the fire.</p> <p>The alarm system in this question refers only to fire alarms. Alarms for other emergencies are covered separately.</p> <p>This question covers legal requirements addressing the presence and functioning of a fire detection and alarm system.</p> <p>Consult applicable legal requirements.</p> <p>If there are no applicable legal requirements, answer No applicable legal requirements.</p>
<b>3. RH-EMP-9: Are contracts for all workers who perform work for the facility, both on the premises and offsite, in line with legal requirements?</b>	<p>Consult applicable legal requirements before answering this question.</p> <p>Employment contracts cannot contain provisions that are less favorable to workers than the law. In addition, applicable legal requirements should be consulted to determine whether provisions that relate specifically to employment contracts have been complied with (e.g., regarding written format, contents, language, etc.).</p> <p>Answer Yes if contracts are in place as required, contracts are up to date and contract content is in line with legal requirements.</p> <p>Answer No if the facility either does not have contracts in place (and they are LEGALLY required) OR contracts do not meet legal requirements.</p>
<b>EXAMPLES</b> Potential Legal Compliance Questions (Do not explicitly reference Legal Requirements)	
<b>1. WT-HAR-1: Have there been any cases of physical, verbal, psychological harassment, violence or abuse?</b> <b>2. WT-HAR-2: Are there written records of these cases?</b>	<p>"For example, this could include hitting, pushing, or throwing things; restricting access to food, water or toilets; threatening or shouting at workers; or publicly scolding workers in a degrading manner. Restricting reasonable access to water or toilets in this context is different from inadequate access in general. In this case, it is targeted to certain workers and/or violates human rights or dignity[...]"</p>

<p><i>In some countries/regions, including India (Sexual Harassment of Women at Workplace Act, 2013), employers are legally required to establish formal complaint mechanisms, maintain records, and follow prescribed procedures. If verification reveals that the facility does not meet applicable legal obligations, and the Tool enables entry of Non-Compliance and Legal Reference for the relevant question, the Verifier must select Non-Compliance and provide the specific Legal Reference — even though the question itself does not explicitly refer to legal requirements.</i></p>	<p>The intent of the question is to determine if, upon receipt of complaint of harassment:</p> <ul style="list-style-type: none"> <li>• the dates, times and facts of the incident(s) were immediately recorded</li> <li>• the views of the victim as to what outcome he/she wants were ascertained</li> <li>• the victim understood the company's procedures for dealing with the complaint</li> <li>• Next steps were discussed and agreed: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome</li> <li>• records of all discussions have been kept confidentially</li> <li>• the rights of the victim have been respected</li> <li>• the victim is aware of her/his right to lodge the complaint outside of the company through the relevant country/legal framework"</li> </ul>
<p><b>3. WH-WOR-3: Does the facility maintain only one accurate set of working hour records?</b></p>	<p>The intent of this question is to understand if the facility maintains one working hour record only for workers and if it is accurate (working hours reflect actual facility operations) and complete (the record is maintained for all workers).</p> <p><b>Note</b>, that should any legal non-compliances regarding the maintenance of the working hour record be identified by the Verifier/ Assessor, a legal Non-Compliance will be applied for this question.</p>

#### 4.4 Verification / Assessment Details – what report readers rely on

This section explains how Verifiers must complete the Verification / Assessment Details section so that verified assessment reports provide reliable context about the verification process, support data integrity, and are usable by SLCP customers. This guidance focuses on what must be recorded and why it matters to report readers, not on restating Tool instructions. The Verification / Assessment Details section provides report readers with essential context about **how the verification was conducted**. This section helps readers understand the **scope, duration, and integrity of the verification process**, and supports confidence in the verified assessment results. SLCP customers rely on this section to interpret the verified data, especially where findings may be sensitive, complex, or disputed.

**Verification Protocol – Section 3.4.5.1 and 3.4.5.2:** All fields in the Verification/Assessment Details section must be completed. The Verifier must enter Verification/Assessment Details about the facility if the facility engages in behavior that negatively impacts process integrity. [Return to the top.](#)

**What Verifiers must record in Verification / Assessment Details**

Area	What Verifiers must do	What report readers rely on
Completion of fields	Complete all fields in the Verification / Assessment Details section. If no information applies, enter “N/A” rather than leaving the field blank.	Confidence that the verification process was fully documented and no information is missing.
Verification scope & approach	Clearly reflect how the verification was conducted (onsite, virtual, or combined) and what activities were included.	Understanding the depth, method, and limitations of the verification.
Verification duration	Record the total verification duration in person-days, based only on actual verification activity. Do not include time spent on background checks, report writing, or quality review.	Transparency on effort spent and comparability across verified assessments.
Process integrity observations	Record confirmed cases where facility behaviour affected process integrity or honest data reporting (e.g. misleading information, withheld records, unreliable practices).	Awareness of data reliability risks and context behind the findings.
How to document integrity issues	Report only confirmed, factual observations. Entries are visible to the facility and must remain objective, neutral, and aligned with the principle of true data.	Trust that observations are evidence-based and fairly represented.
When not to document in the report	If concerns cannot be documented transparently without risk or uncertainty, use confidential reporting mechanisms instead of the report.	Protection of sensitive issues without compromising report integrity.

**4.5 Verification Summary**

The Verification Summary is an automated output of the Tool that compiles **all Legal Non-compliance** items, regardless of the Assessor/Verifier Selection used for individual questions, and all questions associated with the **Assessor/Verifier Selection Inaccurate-Incorrect**. The Verification Summary includes two indexes that can be useful during the closing meeting:

- **Accuracy Index** – compares the number of **Inaccurate-Incorrect** responses against the total number of facility responses.
- **Completion Index** – compares the number of questions answered by the facility against the total number of questions applicable to the facility.

The Completion Index may fall below 100% after verification. For example, when a facility provides an Inaccurate – Incorrect response, the Assessor/Verifier Response entered by the Verifier may cause additional questions to appear that were not previously visible to the facility during

the self-/joint-assessment. These questions are applicable to the facility but were not answered, thus bringing the Completion Index below 100%. It is the Verifier's responsibility to answer these additional questions accurately.

#### **Verification Protocol – Section 3.3.7.1**

*Prior to the closing meeting, the Verifier must take the time to complete all “Inaccurate - Incorrect”, “Non-Compliance” (for Verification Summary) and “Updated during Verification” items to prepare for the closing meeting*

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#### **4.5.1 How is the Verification Summary used?**

The Verification Summary is used to highlight the main issues that should be of concern to the facility and to support a clear and focused closing meeting. It allows the Verifier to guide the discussion using a **consolidated view of key inaccuracies and non-compliances**, without needing to present fully written explanations at that stage.

For this reason, it is not necessary to complete all Assessor/Verifier Explanation or Legal Reference fields onsite, regardless of the country or whether the Law Overlay is in place. The primary purpose of the Verification Summary is to facilitate discussion during the closing meeting, not to serve as the final written report.

If the Verifier chooses to complete all content reflected in the Verification Summary during the onsite verification, the following fields must be completed beforehand:

- Verification Start Date (in Verification / Assessment Details),
- Assessor/Verifier Selection,
- Assessor/Verifier Response,
- Assessor/Verifier Explanation,
- Non-Compliance, and
- Legal Reference.

If time is limited during onsite verification, SLCP recommends prioritising accuracy of selections and responses and completing more detailed narrative elements after the closing meeting.

As per Protocol, the Verifier must submit the verified assessment report for review and final approval within **10 calendar days** after the onsite verification. The verified assessment report submitted via the Accredited Host platform includes the completed Verification Summary that is auto-generated when all required Verifier responses have been completed.

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#### 4.5.2 How to generate the Verification Summary (offline Tool)?

To generate or update the Verification Summary in the offline Excel Tool

1. Go to the **Verification Summary** section (the last sheet in the Tool).
2. Select **“Click here (no double-click) and wait to create/update Verification Summary”** at the top-left corner of the sheet.

Only a single click should be used. Double-clicking may cause errors in the file. This action must be repeated whenever updates to Assessor/Verifier Explanation or related fields need to be reflected in the Verification Summary. The same applies after downloading a new copy of the offline Verifier Tool from the Accredited Host platform.

If the Tool contains **many inaccuracies or non-compliances**, generating the Verification Summary may take some time.

The Verification Summary only contains the Inaccurate-Incorrect items and any identified non-compliances. Apart from focusing on these items, Verifiers should also ensure that all **Updated during Verification** items are completed to support a comprehensive closing meeting. In the Verification Summary, facility responses appear in grey, and Verifier-entered information appears in blue.

Facility Response	Assessor/Verifier Selection	Final Response	Assessor/Verifier Explanation
Morocco	Inaccurate - Incorrect	Bangladesh	Facility must select the correct country for the country specific questions to show up.
2020-11-04	Inaccurate - Incorrect	44774	Facility forgot to update this date
Birth certificates, passports, national ID cards, visas.	Inaccurate - Incorrect	Not copies of ALL documentation are maintained on	Not copies of ALL documentation are maintained on file, there were 26 worker records who had no accor
Yes	Inaccurate - Incorrect	No	Misunderstanding. Legal minimum age for employment in Morocco is 15: Article 32(2)(a) of the Convent
Yes	No longer applicable due to verification	No	Some parental permission documents/ parental signatures exist but this is not common practice in the fa
Yes	Inaccurate - Incorrect	No applicable legal requirements	Dahir n ° 1-03-194 of September 11, 2003 promulgating law n ° 65-99 relating to the Labor Code. No ref
Yes	Inaccurate - Incorrect	No	During conversion of the three mechanic punch clocks to the electronic swipe card method, a duplicate s
X	Inaccurate - Incorrect	During the switch over to the electronic card swipe	During the switch over to the electronic card swipe method discrepancies were found across payroll reco
X	Inaccurate - Incorrect	During the switch over to the electronic card swipe	During the switch over to the electronic card swipe method discrepancies were found between payroll reco

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## 5. Quality, Review, and Follow-Up

This section provides practical guidance to support Verifiers and Verifier Bodies (VBs) in reviewing the quality of the verified assessment report and addressing any updates after submission. The following sections outline what Verifiers should check during quality review, how to handle post-submission updates, and common issues identified through SLCP quality assurance activities.

### 5.1 VB Quality Review – what VBs are responsible for

Before submitting the verified assessment report for facility review, the VB must conduct an internal quality review to ensure that all verification entries are complete, accurate, and consistent. In practice, the VB quality review should focus on confirming that:

- Assessor/Verifier Selections are appropriate and consistently applied
- Explanations clearly describe the reason for Assessor/Verifier Selection and the evidence reviewed
- Any identified non-compliances are correctly reflected
- Legal references are correctly applied where required
- Information is consistent across related questions








The quality review must ensure that the report provides a clear and reliable reflection of the facility's conditions.




Automated Data Quality Checks (VRQ Checks) run on every report before it is submitted to the facility for review. With the help of technology, SLCP identifies common mistakes and the Verifier must correct the identified mistakes before the report is finalized. These checks are helpful to ensure quality review, but they should not be relied on for VB report quality management. Failure of the VRQ Checks is actually an indication of poor VB report quality review systems.

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### 5.2 Frequent Verifier Mistakes

**The below table provides a list of common mistakes made by Verifiers and things to avoid while completing the Tool.** If in doubt about a question in the Tool, please refer back to “More info” as well as to relevant sections of this Verifier Guidance.

Common Mistakes	Explanation
 <p>A Verifier does not enter the “Assessor/Verifier Explanation” correctly when marking a question as “Inaccurate - Incorrect” or “Inaccurate – Misunderstanding”.</p>	<p>The Verifier must:</p> <ul style="list-style-type: none"> <li>• Cite the type of evidence reviewed to determine the question was “Inaccurate”</li> <li>• Provide details on whether the issue was “systemic” or “isolated”</li> <li>• Fully describe the circumstances (the who/what/when/where of the issue)</li> <li>• <b>Do not</b> write the narrative like a non-conformance (e.g., “facility should install an eyewash station”)</li> </ul>
 <p>A Verifier attempts to show that a facility answer is “partially inaccurate” by entering an Assessor/Verifier Selection of “Accurate” and then explaining the details of the part of the answer that was inaccurate in the Assessor/Verifier Explanation.</p>	<p><b>Answers cannot be partially accurate</b>— either accurate or inaccurate (“Inaccurate – Misunderstanding” or “Inaccurate – Incorrect”). <b>Information provided by the facility must be 100% correct and supported by data. Any instance of inaccuracy must result in an Assessor/Verifier Selection of “Inaccurate - Misunderstanding” or “Inaccurate – Incorrect”.</b></p>
 <p><b>For the automated selection “Facility did not reply during SA/JA”</b> the Verifier does not enter the Assessor/Verifier Response or Assessor/Verifier Explanation.</p>	<p><b>Verifiers must enter the Assessor/Verifier Response and Assessor/Verifier Explanation</b> providing a short statement of why the facility did not reply and what information was reviewed to support the Assessor/Verifier Response.</p>
 <p><b>For the automated selection “Not visible to facility during SA/JA”</b>, the Verifier does not enter the Assessor/Verifier Response or Assessor/Verifier Explanation</p>	<p><b>Verifiers must enter the Assessor/Verifier Response and Assessor/Verifier Explanation</b> providing a short statement of why the facility did not see the question in the self/joint-assessment and what information was reviewed to support the Assessor/Verifier Response.</p>
 <p>A Verifier enters an <b>Assessor/Verifier Selection of “Accurate”</b> but then includes an <b>Assessor/Verifier Explanation</b> that indicates the Facility Response is <b>inaccurate</b>.</p>	<p>The Verifier must enter Assessor/Verifier Explanation that <b>positively supports</b> the Verifier’s Assessor/Verifier Selection.</p>
 <p>A Verifier does not add necessary clarity or more information to a Facility Response.</p>	<p>The Verifier must ensure there <b>is sufficient and clear information in the facility’s free text responses</b> (this is mostly applicable to Follow-up Questions)</p>
 <p>A Verifier does not <b>enter legal issues correctly</b>.</p>	<p>This includes:</p>

	<ul style="list-style-type: none"> <li>- Raising a Non-Compliance when an “Inaccurate - Incorrect” or “Inaccurate – Misunderstanding” Assessor/Verifier Selection relates to a legal requirement</li> <li>- Raising a Non-Compliance when an “Accurate” Assessor/Verifier Selection relates to a legal requirement</li> </ul>
 <p>A Verifier <b>does not read the “More Info”</b>.</p>	<p>The More Info is there for the facility and the Verifier. If there is any doubt in the Verifier’s mind that the facility did not respond accurately, the Verifier must consult the <b>“More Info”</b>. Consulting "More Info" avoids misunderstanding or misinterpretation of the questions and ensures correct verification.</p>
 <p>A Verifier <b>does not take the time to assess the accuracy and completeness</b> of the information provided by the facility.</p>	<p>Verifiers have marked questions as “Inaccurate” because of <b>perceived</b> non-compliances, rather than properly assessing the information, which has resulted in incorrect verification.</p>
 <p>A Verifier <b>does not include details in the Assessor/Verifier Explanation field so the report reader can better determine remediation efforts.</b></p>	<p>If the Final Response shows a result that according to Verifier’s social auditing experience would normally result in a code of conduct or standard non-compliance (no matter if the Assessor/Verifier Selection is Accurate or Inaccurate), <b>Assessor/Verifier Explanation must include details so that the report reader can better inform remediation efforts.</b></p>

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### 5.3 Final Checks Before Submission

Before finalizing the verified assessment report, Verifiers should ensure that:

- Verification entries are completed in **English** and use clear, professional language
- Assessor/Verifier Selections are accurate and consistently applied across related questions
- Assessor/Verifier Explanations:
  - Clearly explain the **Reason** for the selection
  - Reference at least **one verification source** (e.g., Documentation Review, Worker Interview, Management Interview, Facility Walkthrough)
  - Are consistent with the **evidence reviewed** and the **Assessor/Verifier Selection**
  - Follow the requirements to **pass the Automated Data Quality Check**
- All required narratives, including for **the 179 keys where Explanation is mandatory**, are completed in line with SLCP requirements
- Where applicable:
  - Legal non-compliance is correctly identified
  - Legal references are clearly stated
  - The explanation describes how the verified situation results in a breach of applicable law
- Verification entries, including photos, do not contain worker names or any personally identifiable information
- Where photographs are not permitted due to confidentiality, this is clearly noted in the Verification/Assessment Details
- Photos are attached, where available, to support:
  - “Inaccurate – Incorrect” responses
  - Legal non-compliance where visual evidence is available
- Attachments support the explanation and are linked to the correct question or topic
- Any identified inaccuracy is consistently reflected across related questions (holistic triangulation)

**Commonly Asked Questions:** SLCP and VOO have developed an online list of useful questions asked by Verifiers and answered by SLCP/ VOO. Before submitting a ticket to the Helpdesk, Verifiers are encouraged to review the available [FAQ resources](#) to check if their question has already been addressed. The questions are organized by topic and subtopic to support easy navigation and are updated regularly.

### 5.4 Post-VRF Edits – exceptional cases

In exceptional circumstances, issues may be identified after the verified assessment report has been finalized. In such cases, the VOO will notify the VB, Verifier(s), and Accredited Host (AH), and the assessment status may be temporarily changed to “Verification being Edited” (VRE). Depending on the situation, updates may be coordinated directly by the VOO with the AH, or the Verifier may be instructed to make the required changes. The Verifier should work with the VOO to determine the appropriate edits and ensure that updates are completed accurately and in a timely manner. When making updates:

- Only make changes that are clearly instructed and supported by evidence
- Ensure that updates remain consistent with the rest of the report
- Re-check related questions if changes affect multiple data points

Refer to the SLCP [QA Manual](#) for further details.

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## 6. Worker Engagement and WE Tech

This section provides practical guidance on how Verifiers assess worker engagement during verification, including the involvement of workers and their representatives, and the use of Worker Engagement Technology (WE Tech).

### 6.1 Understanding Worker Engagement and WE Tech

Worker engagement in SLCP refers to the involvement of workers and/or their representatives (e.g., trade unions, worker committees) in the assessment process, as well as the use of Worker Engagement Technology (WE Tech).

[WE Tech](#) is used to collect anonymous worker feedback through surveys, providing an additional source of information on working conditions within the facility.

The [WE Question Set](#) is designed to complement, not replace, information collected through the Data Collection Tool and other verification activities. Verifiers should use WE Tech results as one source of information alongside document review, interviews, and observations.

### 6.2 Verifying Worker Engagement in the Facility

Verifiers should assess whether workers and/or their representatives were meaningfully involved in the SLCP assessment process and understand the extent of that engagement. This includes confirming the facility's response to **FP-BAS-27** and related follow-up questions and reviewing how workers or their representatives contributed to the self/joint-assessment. Worker engagement may be implemented in different ways. This typically includes:

- Engagement through worker representatives (e.g., trade unions or worker-management committees)
- Direct involvement of workers in the assessment process
- Use of the SLCP Worker Engagement Question Set (WE Tech), where applicable

Worker-management committees typically function as a forum for communication and consultation between workers and management.

SLCP recommends involving worker representatives, where available, as part of the assessment process. Verifiers should consider whether the facility has followed this approach when assessing the extent of worker engagement. When verifying FP-BAS-27 and related questions, Verifiers should:

- Confirm whether worker engagement took place
- Understand the method(s) of engagement used (including whether WE Tech was used)
- Assess whether worker representatives credibly represent the workforce (e.g., gender, departments, roles)
- Review how workers and/or representatives were involved in the assessment process
- Consider whether engagement mechanisms (e.g., worker committees) are functional (e.g., regular meetings, discussion of workplace issues)

Verifiers should document in the Assessor/Verifier Explanation how worker engagement was implemented, including the method(s) used (e.g., committees, direct engagement, WE Tech) and the extent of worker involvement. Additional guidance on worker engagement approaches is available on the [SLCP Helpdesk](#).

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### Example of how to verify the extent of worker engagement in the facility

EXAMPLE: Verifying Worker Engagement in the Facility
1. Review the list of worker-management committee members. Assess if the personnel selected represent their constituents in a credible way, taking into consideration factors of gender, position, department, etc. Also consider these factors in ensuring an equal balance of worker representation.
2. Determine if worker-management committee members were democratically elected.
3. Assess if the worker management committee conducts regular scheduled meetings with workers and management to discuss progress and lessons learned.
4. Determine if the worker management committee, in collaboration with key facility stakeholders, has developed a management plan and that this management plan contains clear goals and time-bound targets to enable the facility to stay focused and on track to meet its objectives with respect to improved working conditions in the facility.

### 6.3 Using WE Tech Results During Verification

The SLCP [WE Question Set](#) is a survey tool used to collect anonymous feedback from workers on working conditions in the facility. The survey results are compiled into an anonymous, aggregated WE Tech Summary Report, which provides additional information on worker perspectives. The report supports:

- The facility in completing the self/joint-assessment
- The Verifier in conducting verification
- Report readers in understanding worker perspectives

Verifiers should use the WE Tech Summary Report as an additional source of information and triangulate it with other verification sources (e.g., documents, interviews, and observations). Verifiers should:

- Ensure they have access to the WE Tech Summary Report prior to or during verification
- Identify which Tool questions are informed by the WE Tech results
- Record relevant information in the Assessor/Verifier Explanation
- Attach the report or relevant documents to the appropriate Tool question (or to FP-BAS-27 where applicable)

The WE Tech Summary Report is shared with both the facility and the Verifier Body/Verifier(s) by the WE Tech Service Provider. Where applicable, the **Verifier Body should ensure** the report is made available to the Verifier.

**The WE Tech Summary Report will be attached by the Verifier to the final verified assessment for question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section of the report.** This means that any user with whom the facility shares the final verified assessment report will receive the WE Tech Summary Report and the Verifier comments. See [Verification Protocol](#) for further details. **The Verifier must NOT** judge or evaluate (e.g., completeness, appropriateness) the information or documentation shared by the facility in relation to use of WE Question Set data and follow up on any post WE Question Set planning/ action.

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**Note:** Any SLCP signatory who uses the verified assessment data, which will include the WE Question Set data, has signed the SLCP Signatory Charter and commits to respecting “the principle of true data in SLCP assessments by recording and accepting honest data, and by prioritizing remediation over punishment”

## 6.4 Applying WE Findings and Documenting in the Tool

Facilities may use the WE Tech Summary Report to identify areas for improvement and develop follow-up actions. While this may not always be completed prior to finalizing the self/joint-assessment, any available documentation or actions taken should be reviewed during verification.

Verifiers should assess, through documentation review and/or management interviews, whether the facility has taken or plans to take any actions in response to the WE Tech Summary Report (e.g., further investigation, prioritization of issues, root cause analysis, or development of an improvement plan).

Where relevant, Verifiers should:

- Ask whether issues identified through the WE Question Set have been discussed or addressed (e.g., included in worker-management committee meetings or internal reviews)
- Determine whether any follow-up actions have been planned or implemented by the facility
- Identify if WE Question Set topics relate to specific Tool questions
- Document the facility’s response in the Assessor/Verifier Explanation
- Attach any relevant documentation provided by the facility to the appropriate Tool question, or to **FP-BAS-27** where the information is more general

The Verifier must determine through documentation review and/or management interviews how the facility intends to use the WE Tech Summary Report for further actions to improve working conditions and worker well-being (e.g., does the facility have any documentation related to e.g., further investigation, prioritization of issues, root cause analysis, improvement plan?). **The Verifier must then document the facility answers and attach any applicable documents to question FP-BAS-27 in the Worker Engagement Category of the Facility Profile Section.**

## 6.5 Common Misinterpretations to Avoid

When using Worker Engagement and WE Tech information during verification, Verifiers should be aware of the following:

- **Do not treat WE Tech results as standalone evidence:** WE Tech results should be used as one source of information and must be triangulated with other verification sources (e.g., documents, interviews, observations).
- **Do not interpret or validate WE Tech data on behalf of the facility:** The Verifier should not assess the accuracy, completeness, or appropriateness of the survey results or how the facility interprets them.
- **Do not support or develop facility improvement plans:** The Verifier should not advise the facility on how to respond to WE Tech findings or assist in developing corrective or improvement actions.
- **Do not reuse WE Question Set questions in worker interviews:** Worker interviews conducted during verification must remain independent and should not replicate WE Question Set questions.
- **Do not assume lack of WE Tech results means lack of worker engagement:** Worker engagement may take different forms (e.g., worker representatives, committees, direct worker involvement) and should be assessed accordingly.

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## 7. Full Virtual Verification (FVV)

Full Virtual Verification (FVV) was developed to enable SLCP verification in situations where onsite access was not possible, particularly during force majeure events such as the COVID-19 pandemic. The intent was to allow verification activities to be conducted fully remotely through the use of digital systems, document sharing, and virtual communication tools.

FVV was designed with strict eligibility conditions to ensure that verification outcomes remained reliable despite the absence of onsite access. At a high level, facilities were required to demonstrate that they were operating under force majeure conditions over a sustained period and to provide supporting evidence through a self-declaration process. In addition, facilities were expected to have specific operational capabilities in place, such as electronic systems for wage and working hours records, stable internet connectivity, and the ability to share documents and conduct virtual walkthroughs.

In practice, FVV has not been widely used. The eligibility conditions—particularly those related to the duration and continuation of force majeure situations—were rarely met. In many cases, facilities resumed operations or were able to accommodate onsite or hybrid verification approaches before meeting the criteria required for FVV.

FVV also presents several practical limitations. It is not necessarily more efficient or cost-effective than onsite or hybrid verification, as it often requires more time for document review, coordination, and follow-up. Reliance on technology introduces additional challenges, including connectivity issues and limitations in conducting effective remote observations. Facilities are also required to invest in systems, training, and coordination to support a fully virtual process, which may increase the overall burden.

FVV remains defined within the SLCP framework; however, it is not expected to be widely applied in practice. Verifiers should be aware that, if FVV is used, requirements are detailed in the relevant SLCP protocol and associated materials.

Looking forward, SLCP is exploring alternative approaches to address situations where onsite verification is not feasible. These include enhanced worker engagement methods, use of external service providers, and other mechanisms to obtain reliable information on working conditions. As part of this evolution, FVV is likely to be phased out in future versions of the CAF in favor of approaches that are more practical and scalable.

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## 8. Appendices

### 8.1 Sample Opening Meeting Agenda

1. **Introductions:** Introduce the verification team and confirm key facility representatives participating in the opening meeting.
2. **Scope and verification approach:** Explain the scope of the verification, including applicable standards, tool coverage, and key verification activities (e.g. facility walkthrough, interviews, documentation review).
3. **Emphasize accurate and honest data:** Encourage the facility to be open and transparent during the SLCP process and follow the [CAF Terms of Use](#). Carry a print out of the CAF Terms of Use to facilitate this conversation.
4. **Facility overview and access:** Review the facility layout/map to confirm all relevant areas are included in the verification scope. Confirm access to all production and non-production areas. The facility should inform the verification team of any required PPE or safety orientation to ensure safe conduct of onsite activities.
5. **Objective of verification:** Clarify that the purpose of the verification is to assess whether the self-assessment has been completed accurately, validate the reliability of the data, and identify any inaccuracies (including incorrect responses or misunderstandings) as well as any non-compliance with applicable legal requirements.
6. **Confidentiality and data handling:** Explain that information will be collected from multiple sources, including potentially sensitive or confidential data. Any information that could identify individual workers will be treated as confidential and will not be disclosed outside the verification process. Such data may only be accessed by the SLCP Verification Oversight Organization (VOO) for quality assurance or investigation purposes.
7. **Verification process and reporting timeline:** Outline the verification methodology, including data triangulation and evidence review. Explain the expected timelines for completion and submission of the verified assessment, facility review of results, and the process for raising questions, concerns, or formal disputes with the Verifier Body.

### 8.2 Sample Closing Meeting Agenda

1. **Appreciation and closing context:** Thank facility management and staff for their time, cooperation, and support throughout the verification process.
2. **Reiteration of SLCP approach:** Briefly reiterate the purpose of the Social & Labor Convergence Program (SLCP), emphasizing that the process focuses on data verification rather than certification or compliance grading.
3. **Summary of key findings:** Present an overview of key discrepancies identified between the self-assessment and verification findings. Where available, refer to the Verification Summary. If not fully completed, highlight key areas of:
  4. Inaccurate – Incorrect
  5. Inaccurate – Misunderstanding
  6. Non-compliance with applicable legal requirements
7. **Acknowledgement of cooperation:** Acknowledge the cooperation of facility personnel and the availability and transparency of information provided during the verification.
8. **Confidentiality of results:** Reconfirm that the verified data will be handled confidentially and shared in accordance with SLCP data-sharing protocols.
9. **Report timeline and data submission:** Inform the facility that the verified assessment data will be submitted within ten (10) working days from the final day of the verification.
10. **Scope limitation – no Corrective Action Plans:** Clarify that Verifiers and Verifier Bodies do not provide corrective action plans or improvement recommendations, as this is outside the scope of SLCP.
11. **Post-verification clarifications (grace period):** Where applicable and under exceptional circumstances, explain the two-day grace period during which the facility may provide additional information or clarification to support or substantiate assessment data.

12. **Dispute Process:** Explain the process for raising questions, concerns, or formal disputes related to the verification outcome.
13. **Data sharing (if applicable):** Where relevant, inform the facility about the sharing of verified assessment data with other authorized users, in line with SLCP data-sharing protocols and permissions.

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### 8.3 Verification Plan Guidance

No matter the Validation method (Onsite, Virtual + Onsite, Full Virtual Verification) the Verifier must provide the facility with a Verification Plan. The [Verification Protocol](#) lists the requirement for development of the [Verification Plan](#) for each of the three SLCP Validation methods.

1. **Onsite Verification:** The Verifier/VB must send a verification plan no less than five working days prior to the scheduled verification
2. **Virtual + Onsite Verification:** Verifier/VB must send a verification plan no less than five working days prior to the scheduled verification and virtual verification activity must have set dates and times and personnel included in the verification plan
3. Verifier/VB must send a Full Virtual Verification plan no less than five working days prior to the scheduled Full Virtual Verification with set dates and times and personnel included in the verification plan

**Note:** For Virtual + Onsite Verification and Full Virtual Verification the Verification Plan **requires more detail than the plan for just an onsite verification.** It must adhere to the 4-calendar day timeframe and outline all times, dates and personnel required for the full virtual activity.

**The Verifier must attach the Verification Plan to the Validation method question via the online AH platform for both Virtual + Onsite Verification and Full Virtual Verification.**

### 8.4 Verification Plan Sample (Virtual + Onsite)

#### Rabat Apparel: SLCP Verification Plan

Verified Facility:	Rabat Apparel	Job No.:	000001
Facility address:	123 Morocco Enclave, Rabat, Morocco 10000	Assessment ID:	PRJ000001
No of employees:	498	Verifier(s):	[Name]
Step completed	3	Verification Start Date:	2021-03-01
Announcement Type	[Announced, Semi-announced with # day window, Unannounced]	Verification End Date:	2021-03-02
Person-days onsite:	2	Person-days virtual:	1.5
Offsite Person-day for verification preparation and report writing:	1	Total Person-days:	4.5

#### 2021-03-01: Day 1 Virtual

Duration	Team A: [Name]	Team B: [Name]
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09:00 – 10:00	<b>Virtual pre-verification meeting with [Name] (HR Manager)</b> <ul style="list-style-type: none"> <li>– Testing video conferencing software including in production areas</li> <li>– Explanation to facility management on virtual verification methodology</li> <li>– Question and answer period</li> </ul>	
10:00 – 10:15	<b>Opening Meeting with</b> <ol style="list-style-type: none"> <li>1) [Name] (HR Manager)</li> <li>2) [Name] (Facility Manager)</li> <li>3) [Name] (OSH Manager)</li> <li>4) [Name] (Trade Union Representative/ Worker Engagement Committee/ Worker Representative)</li> </ol>	
10:15 – 11:00	<b>Verification Team Internal Meeting + documents review of soft copies provided:</b> <ul style="list-style-type: none"> <li>– Policies and procedures as attached by facility in Mgt System section</li> <li>– Occupational health and safety certificates &amp; operation records</li> <li>– Production and quality records</li> <li>– Employee handbook &amp; Facility rules</li> <li>– Production and quality records</li> <li>– Emergency Response Plan</li> <li>– Evacuation procedures</li> <li>– Complaints/ dispute resolutions procedures</li> </ul>	
11:00 - 12:30	<b>Virtual Management interview with [Name] (Facility Manager)</b> <ul style="list-style-type: none"> <li>– Follow up questions re: documentation reviewed</li> </ul> <b>Virtual document review with [Name] (HR Manager)</b> <ul style="list-style-type: none"> <li>– Training records</li> </ul>	<b>Virtual walkthrough (refer to facility map) with [Name] (OSH Manager)</b> <ul style="list-style-type: none"> <li>– Areas listed in map as: Workshop, Warehouse, Production</li> </ul>
12:30 – 13:30	<b>Lunch Break + Verification Team Internal Meeting</b>	
13:30 - 17:00	<b>Virtual document review with [Name] (HR Manager)</b> <ul style="list-style-type: none"> <li>– “Real time” review of wage and hours records (8 x set of 3 = 24)</li> </ul>	
17:00 – 17:30	<b>Wrap up meeting with Management Representative</b>	

**2021-03-02: Day 2 Onsite**

Duration	Team A: [Name]	Team B: [Name]
09:00 – 10:45	<b>Onsite documents review:</b> <ul style="list-style-type: none"> <li>– Business license</li> <li>– Operational permits and certificates</li> </ul>	<b>Onsite worker individual interviews:</b> <ul style="list-style-type: none"> <li>– Individual worker interviews</li> </ul>

	<ul style="list-style-type: none"> <li>– Machinery and equipment maintenance records</li> <li>– Verification of presence of hardcopy documents matching soft copy documents used for virtual verification</li> </ul>	<p>(15 in total)</p> <ul style="list-style-type: none"> <li>– Full time (3 female/ 4 male)</li> <li>– Part time (3 female/ 5 male)</li> </ul> <p>1 returning from maternity leave 1 pregnant 2 new hires 1 under probation</p>
10:45–12:00	<p><b>Onsite worker records review:</b></p> <ul style="list-style-type: none"> <li>– Personnel files (30)</li> <li>– Accident incident records</li> <li>– Complaints/ dispute resolutions reports</li> </ul>	
12:00 - 13:00	Lunch Break + Verification Team Internal Meeting	
13:30 – 16:00	<p><b>Onsite worker records review:</b></p> <ul style="list-style-type: none"> <li>– Wage and hours records review 19 x 3 (57)</li> </ul> <p><b>NOTE:</b> SLCP recommends that if virtual wage/ hours records review took place, the subsequent onsite wage/ hours records review corresponds 100% to workers interviewed onsite.</p> <p>The Verifier is still permitted to interview workers onsite whose records were reviewed virtually. But to ensure the integrity of the verification process, the identity of the majority of the interviewees will still be unknown until the Verifier selects the workers onsite.</p>	<p><b>Onsite worker interviews (group interviews):</b></p> <ul style="list-style-type: none"> <li>– 15 total, 3 groups of 5</li> <li>– Domestic migrant (3 female/ 3 male)</li> <li>– Foreign migrant (all Indonesian) (3 female/ 3 male)</li> <li>– Young workers (all 16 years old) (1 female/ 2 male)</li> </ul>
16:00 – 17:00	<p><b>Pre-closing Meeting</b></p> <ul style="list-style-type: none"> <li>– Verifier completes all “Inaccurate”, “Non-Compliance” and “Updated during Verification” items to create the Verification Summary and prepare for meeting</li> <li>– Final conversation with [Name] (Trade Union Representative)</li> </ul>	
17:00 – 17:30	<p><b>Closing Meeting with</b></p> <ol style="list-style-type: none"> <li>1) [Name] (HR Manager)</li> <li>2) [Name] (Facility Manager)</li> <li>3) [Name] (OSH Manager)</li> <li>4) [Name] (Trade Union Representative)</li> </ol>	

Note: The above scheduled activities may be adjusted per actual situation.

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**8.5 List of 179 Tool keys (reference)**

ID	Key	Number	Section	Sub-Section	Main Text
1	cl-1	RH-CHI-1	RECRUITMENT & HIRING	Child Labor	Does the facility verify minimum age requirements prior to hiring workers?
2	cl-1--2	RH-CHI-2	RECRUITMENT & HIRING	Child Labor	What is the age of the youngest worker in the facility?
3	rh-chi-13	RH-CHI-4	RECRUITMENT & HIRING	Child Labor	Were any workers under the legal minimum working age when hired?
4	cl-4--10	RH-CHI-18	RECRUITMENT & HIRING	Child Labor	Are protective restrictions for workers under the age of 18 in line with legal requirements?
5	cl-4--12-1x	RH-CHI-20-1	RECRUITMENT & HIRING	Child Labor	Work in a hazardous environment and/or work that is hazardous in nature in violation of legal standards
6	rh-chi-11	RH-CHI-21	RECRUITMENT & HIRING	Child Labor	Have there been any incidences of forced labor, including sale and trafficking, prostitution, pornography, or illegal activities involving workers under age 18, or work that exposes them to physical, psychological or sexual abuse?
7	rh-rec-4	RH-REC-1	RECRUITMENT & HIRING	Recruitment Practices	Are monetary deposits out of line with legal requirements?
8	fl-1	RH-REC-2	RECRUITMENT & HIRING	Recruitment Practices	Are any monetary deposits required of workers?
9	fl-3--1	RH-REC-3	RECRUITMENT & HIRING	Recruitment Practices	Is the facility's recruitment process for foreign migrant workers in line with applicable legal requirements?
10	fl-4	RH-REC-4	RECRUITMENT & HIRING	Recruitment Practices	Who is responsible for paying recruitment fees and related costs, the worker or the facility?
11	fl-4--4	RH-REC-6	RECRUITMENT & HIRING	Recruitment Practices	Are workers reimbursed for recruitment fees and related costs paid?
12	fl-4--5	RH-REC-7	RECRUITMENT & HIRING	Recruitment Practices	Are recruitment fees and related costs paid by workers in line with legal requirements?
13	fl-5	RH-FOR-1	RECRUITMENT & HIRING	Forced Labor	Does the facility use prison labor?
14	rh-for-3	RH-FOR-2-1	RECRUITMENT & HIRING	Forced Labor	Prison laborers have not freely and formally consented to perform the work
15	rh-for-4	RH-FOR-2-2	RECRUITMENT & HIRING	Forced Labor	The facility does not treat prison laborers and non-prison workers similarly (conditions of work such as wages, hours of work, health and safety, etc.)
16	rh-for-5	RH-FOR-2-3	RECRUITMENT & HIRING	Forced Labor	There is no supervision and control by a public authority

17	rh-dis-3	RH-DIS-2-1	RECRUITMENT & HIRING	Discrimination	Race / Ethnic Group / Skin Color referenced and not in line with legal requirements
18	rh-dis-4	RH-DIS-2-2	RECRUITMENT & HIRING	Discrimination	Sex / Gender referenced and not in line with legal requirements
19	rh-dis-5	RH-DIS-2-3	RECRUITMENT & HIRING	Discrimination	Religion referenced and not in line with legal requirements
20	rh-dis-6	RH-DIS-2-4	RECRUITMENT & HIRING	Discrimination	Political Opinion referenced and not in line with legal requirements
21	rh-dis-7	RH-DIS-2-5	RECRUITMENT & HIRING	Discrimination	National Extraction referenced and not in line with legal requirements
22	rh-dis-8	RH-DIS-2-6	RECRUITMENT & HIRING	Discrimination	Social Origin referenced and not in line with legal requirements
23	rh-dis-9	RH-DIS-2-7	RECRUITMENT & HIRING	Discrimination	Disability referenced and not in line with legal requirements
24	rh-dis-11	RH-DIS-2-9	RECRUITMENT & HIRING	Discrimination	Sexual Orientation referenced and not in line with legal requirements
25	rh-dis-12	RH-DIS-2-10	RECRUITMENT & HIRING	Discrimination	Pregnancy / Maternity Status referenced and not in line with legal requirements
26	rh-dis-13	RH-DIS-2-11	RECRUITMENT & HIRING	Discrimination	Marital Status referenced and not in line with legal requirements
27	rh-dis-14	RH-DIS-2-12	RECRUITMENT & HIRING	Discrimination	Age referenced and not in line with legal requirements
28	rh-dis-15	RH-DIS-2-13	RECRUITMENT & HIRING	Discrimination	Nationality / Foreign Migrant Worker Status referenced and not in line with legal requirements
29	rh-dis-20	RH-DIS-4-1	RECRUITMENT & HIRING	Discrimination	Race / Ethnic Group / Skin Color factored into hiring decisions and not in line with legal requirements
30	rh-dis-21	RH-DIS-4-2	RECRUITMENT & HIRING	Discrimination	Sex / Gender factored into hiring decisions and not in line with legal requirements
31	rh-dis-22	RH-DIS-4-3	RECRUITMENT & HIRING	Discrimination	Religion factored into hiring decisions and not in line with legal requirements
32	rh-dis-23	RH-DIS-4-4	RECRUITMENT & HIRING	Discrimination	Political Opinion factored into hiring decisions and not in line with legal requirements
33	rh-dis-24	RH-DIS-4-5	RECRUITMENT & HIRING	Discrimination	National Extraction factored into hiring decisions and not in line with legal requirements
34	rh-dis-25	RH-DIS-4-6	RECRUITMENT & HIRING	Discrimination	Social Origin factored into hiring decisions and not in line with legal requirements
35	rh-dis-26	RH-DIS-4-7	RECRUITMENT & HIRING	Discrimination	HIV / AIDS Status (real or perceived) factored into hiring decisions and not in line with legal requirements

36	rh-dis-27	RH-DIS-4-8	RECRUITMENT & HIRING	Discrimination	Sexual Orientation factored into hiring decisions and not in line with legal requirements
37	rh-dis-28	RH-DIS-4-9	RECRUITMENT & HIRING	Discrimination	Pregnancy / Maternity Status factored into hiring decisions and not in line with legal requirements
38	rh-dis-29	RH-DIS-4-10	RECRUITMENT & HIRING	Discrimination	Marital Status factored into hiring decisions and not in line with legal requirements
39	rh-dis-30	RH-DIS-4-11	RECRUITMENT & HIRING	Discrimination	Age factored into hiring decisions and not in line with legal requirements
40	rh-dis-31	RH-DIS-4-12	RECRUITMENT & HIRING	Discrimination	Nationality / Foreign Migrant Worker Status factored into hiring decisions and not in line with legal requirements
41	rh-dis-33	RH-DIS-4-13	RECRUITMENT & HIRING	Discrimination	Family responsibilities factored into hiring decisions and not in line with legal requirements
42	rh-dis-42	RH-DIS-5-1	RECRUITMENT & HIRING	Discrimination	Facility requires pregnancy tests that are not required by applicable legislation
43	disc-3-2x	RH-DIS-5-2	RECRUITMENT & HIRING	Discrimination	Facility requires virginity test before or at hiring
44	disc-3-3x	RH-DIS-5-3	RECRUITMENT & HIRING	Discrimination	Facility requires worker to provide commitments (verbally or in writing) that they will not become pregnant
45	ep-3	RH-EMP-8	RECRUITMENT & HIRING	Employment Practices	Do all workers who perform work for the facility, both on the premises and offsite have a contract?
46	ep-3--1	RH-EMP-9	RECRUITMENT & HIRING	Employment Practices	Are contracts for all workers who perform work for the facility, both on the premises and offsite, in line with legal requirements?
47	rh-emp-14	RH-EMP-11-1	RECRUITMENT & HIRING	Employment Practices	Signed copies of contracts between the facility and each worker are not maintained on file
48	rh-emp-15	RH-EMP-11-2	RECRUITMENT & HIRING	Employment Practices	Contracts do not clearly and accurately state the terms and conditions of employment
49	rh-emp-16	RH-EMP-11-3	RECRUITMENT & HIRING	Employment Practices	Copies of contracts are not provided to workers, in line with applicable legal requirements
50	rh-emp-13	RH-EMP-12	RECRUITMENT & HIRING	Employment Practices	When making changes to contracts, does the facility seek the written agreement of the affected worker?
51	ep-7	RH-EMP-27	RECRUITMENT & HIRING	Employment Practices	Has the facility acted against legal requirements by hiring temporary/probationary/trainee/fixed-term contract workers to avoid legal obligations?
52	rh-hom-1	RH-HOM-1	RECRUITMENT & HIRING	Homeworkers	Does the facility comply with applicable legal requirements concerning homeworkers?
53	wh-3	WH-WOR-3	WORKING HOURS	Working Hours	Does the facility maintain only one accurate set of working hour records?
54	wh-6	WH-WOR-11	WORKING HOURS	Working Hours	Are all overtime working hours in line with legal limits?

55	wh-7	WH-WOR-15	WORKING HOURS	Working Hours	Did any workers work more than 60 hours in total (regular + overtime) within any given week?
56	wh-7--1	WH-WOR-16	WORKING HOURS	Working Hours	Did any workers work more than 72 hours in total (regular + overtime) within any given week?
57	wh-7--2	WH-WOR-17	WORKING HOURS	Working Hours	Did any workers work more than 80 hours in total (regular + overtime) within any given week?
58	wh-7--3	WH-WOR-18	WORKING HOURS	Working Hours	Did any workers work more than 90 hours in total (regular + overtime) within any given week?
59	wh-8--1	WH-WOR-20	WORKING HOURS	Working Hours	Does the facility provide time off for breastfeeding in line with legal requirements?
60	wh-wor-20	WH-WOR-22	WORKING HOURS	Working Hours	Number of weekly rest days (at least 24 consecutive hours long) provided by the facility:
61	wh-9--1	WH-WOR-23	WORKING HOURS	Working Hours	Are the weekly rest days provided by the facility in line with legal requirements?
62	wb-wag-68	WH-WOR-24	WORKING HOURS	Working Hours	Is the facility failing to correctly provide workers time off for any of these types of leave, as legally required: <ul style="list-style-type: none"> <li>• All public holidays</li> <li>• Annual leave</li> <li>• Sick leave</li> <li>• Maternity leave</li> <li>• Paternity leave</li> <li>• Personal leave</li> <li>• Other types of required leave (which may include country-specific leave requirements)?</li> </ul>
63	fl-7--1	WH-FOR-1	WORKING HOURS	Forced Labor	Are workers forced to work overtime under threat of penalty?
64	wh-ove-2	WH-OVE-1	WORKING HOURS	Overtime	Is overtime voluntary, in line with legal requirements?
65	wh-ove-6	WH-OVE-5	WORKING HOURS	Overtime	When production/volume is lower than expected, how are workers impacted? (SELECT all that apply with a "X")
66	wh-ove-7	WH-OVE-5-1	WORKING HOURS	Overtime	No impact to workers (workers receive their regular pay and come to work)
67	wh-ove-8	WH-OVE-5-2	WORKING HOURS	Overtime	Workers must stay at home and are required to use vacation time/paid time off
68	wh-ove-9	WH-OVE-5-3	WORKING HOURS	Overtime	Worker's hours are reduced
69	wh-ove-10	WH-OVE-5-4	WORKING HOURS	Overtime	Workers must stay at home and are paid legal minimum wage
70	wh-ove-11	WH-OVE-5-5	WORKING HOURS	Overtime	Workers must stay at home and are paid less than legal minimum wage
71	wh-ove-12	WH-OVE-5-6	WORKING HOURS	Overtime	Workers must stay at home and are not paid
72	wh-ove-13	WH-OVE-5-7	WORKING HOURS	Overtime	Other action impacting workers

73	wh-ove-14f	WH-OVE-5.1	WORKING HOURS	Overtime	If other, please describe:
74	wb-2--2	WB-WAGE-2	WAGES & BENEFITS	Wages and Benefits	Does the facility maintain only one accurate payroll record?
75	wb-wage-1	WB-WAGE-3-3	WAGES & BENEFITS	Wages and Benefits	Payroll records do not show all the types of social insurance the workers are paid
76	wb-wage-2	WB-WAGE-4	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the legal minimum wage for any regular hours worked?
77	wb-wage-3	WB-WAGE-5-1	WAGES & BENEFITS	Wages and Benefits	Permanent workers
78	wb-wage-4	WB-WAGE-5-2	WAGES & BENEFITS	Wages and Benefits	Temporary workers
79	wb-wage-5	WB-WAGE-5-3	WAGES & BENEFITS	Wages and Benefits	Casual workers
80	wb-wag-7x	WB-WAGE-5-4	WAGES & BENEFITS	Wages and Benefits	Part-time workers
81	wb-wag-8x	WB-WAGE-5-5	WAGES & BENEFITS	Wages and Benefits	Agency/contract workers
82	wb-wag-9x	WB-WAGE-5-6	WAGES & BENEFITS	Wages and Benefits	Contract workers who are not part of the production process
83	wb-wag-10x	WB-WAGE-5-7	WAGES & BENEFITS	Wages and Benefits	Workers under probation
84	wb-wag-11x	WB-WAGE-5-8	WAGES & BENEFITS	Wages and Benefits	Workers who are trainees, apprentices or interns
85	wb-wage-6	WB-WAGE-6	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the basic wage required under their employment contract for any regular hours worked?
86	wb-wage-7	WB-WAGE-7	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay any worker AT LEAST the basic wage required under the Collective Bargaining Agreement for any regular hours worked?
87	wb-wage-8	WB-WAGE-8	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers overtime in line with legal requirements (Incl. overtime rate and types of overtime)?
88	wb-wag-12	WB-WAGE-9	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers correctly for any of these types of overtime hours, as legally required: <ul style="list-style-type: none"> <li>• Ordinary overtime hours</li> <li>• Overtime hours performed at night</li> <li>• Overtime hours performed on weekly rest days</li> <li>• Overtime hours performed on public holidays?</li> </ul>
89	wb-wag-13	WB-WAGE-12	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to pay workers correctly for any of these types of regular hours worked at a premium rate, as legally required: <ul style="list-style-type: none"> <li>• Regular hours worked at night</li> </ul>

					<ul style="list-style-type: none"> <li>• Regular hours worked on weekly rest days</li> <li>• Regular hours worked on public holidays?</li> </ul>
90	wb-14	WB-WAGE-96	WAGES & BENEFITS	Wages and Benefits	Are wage payments made regularly and on time and in line with legal requirements?
91	wb-wag-43	WB-WAGE-97	WAGES & BENEFITS	Wages and Benefits	Are workers paid their full wages in the legally required manner?
92	wb-16	WB-WAGE-108	WAGES & BENEFITS	Wages and Benefits	Are workers informed about their individual wages and deductions in line with legal requirements (e.g. through pay slips)?
93	wb-wage-64	WB-WAGE-112	WAGES & BENEFITS	Wages and Benefits	Do workers have the ability to dispute and correct wage payments in the event of an error?
94	wb-wag-46	WB-WAGE-118	WAGES & BENEFITS	Wages and Benefits	Does the facility take any deductions from wages that are not in line with legal requirements?
95	wb-wage-75	WB-WAGE-124	WAGES & BENEFITS	Wages and Benefits	Does the facility register their workers with social security institutions, in line with legal requirements?
96	wb-wag-111	WB-WAGE-126	WAGES & BENEFITS	Wages and Benefits	Vietnam: Does the facility collect and forward workers' contributions as legally required and pay the legally required employer contributions to social, health and unemployment insurance funds on time?
97	wb-wag-94	WB-WAGE-129	WAGES & BENEFITS	Wages and Benefits	Does the facility provide legally required compensation/ benefits related to social protection directly to workers (e.g. old age, accident, illness and death benefits)?
98	wb-wage-90	WB-WAGE-139	WAGES & BENEFITS	Wages and Benefits	If the facility has overdue social insurance / social security debts due to non-payment or untimely payment of contributions, is the facility actively correcting this legal non-compliance?
99	wb-wage-91	WB-WAGE-140	WAGES & BENEFITS	Wages and Benefits	Has the facility been subject to any fines or sanctions related to social insurance/ social security?
100	wb-wag-78	WB-WAGE-148	WAGES & BENEFITS	Wages and Benefits	Is the facility failing to correctly pay workers for any of these types of leave, as legally required: <ul style="list-style-type: none"> <li>• All public holidays</li> <li>• Annual leave</li> <li>• Sick leave</li> <li>• Maternity leave</li> <li>• Paternity leave</li> <li>• Personal leave</li> <li>• Other types of required leave?</li> </ul>
101	wt-for-2	WT-FOR-1	WORKER TREATMENT	Forced Labor	Does the employer use any other coercive tactics to force workers to work?

102	hb-1	WT-FOR-2	WORKER TREATMENT	Forced Labor	Have any cases of violence or threats of violence to intimidate workers and force them to work occurred at the workplace?
103	hb-2	WT-FOR-6	WORKER TREATMENT	Forced Labor	Have any cases of threats, such as reporting to authorities, deportation or threats against a worker's family/close associates, or cancelation of visa or other documents (e.g. work permits, residence permits, etc.) occurred in order to force migrant workers to stay at the job?
104	hb-3	WT-FOR-7	WORKER TREATMENT	Forced Labor	Have workers been forced to work as a disciplinary measure or as punishment for participation in a strike?
105	fl-9--1	WT-FOR-9	WORKER TREATMENT	Forced Labor	Are workers restricted from leaving the workplace in order to force them to work?
106	wt-for-5	WT-FOR-10	WORKER TREATMENT	Forced Labor	Are workers free to come and go from the dormitories and the industrial park or zone in which the facility is located?
107	fl-14--1	WT-FOR-11	WORKER TREATMENT	Forced Labor	Have workers been denied access to any of their original personal documents (such as birth certificates, passports, work permits and ID cards) when they need them?
108	hb-4	WT-HAR-1	WORKER TREATMENT	Harassment and Abuse	Have there been any cases of physical, verbal, psychological harassment, violence or abuse?
109	hb-5	WT-HAR-12	WORKER TREATMENT	Harassment and Abuse	Have there been any cases of harassment based upon race, ethnic group, skin color, religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, gender identity, pregnancy/maternity status, marital status, family responsibilities, age, nationality/foreign migrant worker status?
110	wt-dis-2	WT-DIS-1	WORKER TREATMENT	Discrimination	Have there been cases of sexual harassment?
111	wt-dis-6	WT-DIS-7	WORKER TREATMENT	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding compensation?
112	wt-dis-24	WT-DIS-9	WORKER TREATMENT	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding conditions of work?
113	wt-dis-47	WT-DIS-18	WORKER TREATMENT	Discrimination	How many workers became disabled for a work-related reason?
114	wt-dis-35	WT-DIS-23	WORKER TREATMENT	Discrimination	Is the facility in line with legal requirements when administering other infection or illness tests (e.g. Hepatitis B) during employment?

115	wi-foa-2	WI-FOA-1	WORKER INVOLVEMENT	FOA & CB	Are workers free to form a trade union of their choosing?
116	wi-foa-3	WI-FOA-2	WORKER INVOLVEMENT	FOA & CB	Are workers free to join a trade union of their choosing?
117	wi-foa-35	WI-FOA-46	WORKER INVOLVEMENT	FOA & CB	Does the employer allow workers to carry out trade union activities in accordance with applicable legal requirements?
118	foa-cb-4	WI-FOA-47	WORKER INVOLVEMENT	FOA & CB	Are workers and workers' representatives free to meet without the presence of management?
119	foa-cb-4--3	WI-FOA-49	WORKER INVOLVEMENT	FOA & CB	Has the facility management tried to control, manipulate or interfere with any of the unions in the facility?
120	foa-cb-4--7-1x	WI-FOA-51-1	WORKER INVOLVEMENT	FOA & CB	Threatened intimidated, or harassed
121	foa-cb-4--7-2x	WI-FOA-51-2	WORKER INVOLVEMENT	FOA & CB	Punished
122	foa-cb-4--7-3x	WI-FOA-51-3	WORKER INVOLVEMENT	FOA & CB	Terminated workers or did not renew their contract
123	wi-foa-37	WI-FOA-52	WORKER INVOLVEMENT	FOA & CB	Were terminations of trade union official(s) (if any) in line with applicable legal requirements?
124	wi-foa-71	WI-FOA-53	WORKER INVOLVEMENT	FOA & CB	Do Trade Union representatives have time off to carry out their representative functions?
125	wi-foa-72	WI-FOA-54	WORKER INVOLVEMENT	FOA & CB	Do Trade Union representatives have time off to attend relevant trainings or meetings outside the factory?
126	wi-foa-73	WI-FOA-55	WORKER INVOLVEMENT	FOA & CB	Are Trade Union Officers from the Federation/External Trade Union granted access to meet with Trade Union members' representatives?
127	wi-foa-39	WI-FOA-81	WORKER INVOLVEMENT	FOA & CB	If the facility has no trade union, are workers free to choose their non-union representatives?
128	erg-2--1	WI-WOR-3	WORKER INVOLVEMENT	Workplace Cooperation	Has the facility threatened, intimidated, harassed, punished, terminated or not renewed worker contracts due to their worker representative role or activities?
129	wi-wor-21	WI-WOR-6	WORKER INVOLVEMENT	Workplace Cooperation	Are workers aware of the committee's role and advantages?
130	wi-wor-23	WI-WOR-15	WORKER INVOLVEMENT	Workplace Cooperation	Were at least two-thirds of the meetings attended by 100 % of members?
131	wi-gri-11	WI-GRI-10	WORKER INVOLVEMENT	Grievance Systems	How many times has the grievance mechanism been used in the assessment period?
132	wi-whi-1	WI-WHI-1	WORKER INVOLVEMENT	Whistleblower Systems	Does the facility have a whistleblower system in place?
133	hs-gen-7	HS-GEN-17	HEALTH & SAFETY	General Work Environment	Are the facility's waste disposal practices in line with legal requirements?

134	hs-gen-10	HS-GEN-31	HEALTH & SAFETY	General Work Environment	Are workers allowed access to toilets/restrooms at any time?
135	hs-gen-12	HS-GEN-34	HEALTH & SAFETY	General Work Environment	Are workers allowed access to drinking water at any time?
136	hs-bui-1	HS-BUI-1	HEALTH & SAFETY	Building Safety	Are building/construction, structural safety and fire permits and certificates in line with legal requirements?
137	hs-8--2	HS-BUI-2	HEALTH & SAFETY	Building Safety	Have there been and/or are there currently cases of concern about the physical integrity and stability of the facility?
138	hs-8--3	HS-BUI-3	HEALTH & SAFETY	Building Safety	Are facility doors, exits and stairs in line with legal requirements?
139	hs-ris-1	HS-RIS-1	HEALTH & SAFETY	Risk Assessment	Has the facility conducted a health and safety risk assessment in line with legal requirements?
140	hs-eme-1	HS-EME-3	HEALTH & SAFETY	Emergency Preparedness	Does the facility have a fire detection and alarm system in line with legal requirements?
141	hs-19--3	HS-EME-4	HEALTH & SAFETY	Emergency Preparedness	Does the facility have a fire detection and alarm system in place, although there are no applicable legal requirements?
142	hs-eme-2	HS-EME-5	HEALTH & SAFETY	Emergency Preparedness	Does the facility have an emergency alarm system (for all types of emergencies other than fire) in line with legal requirements?
143	hs-eme-8	HS-EME-6	HEALTH & SAFETY	Emergency Preparedness	Does the facility have an emergency alarm system (for all types of emergencies other than fire), although there are no applicable legal requirements?
144	hs-20--4	HS-EME-8	HEALTH & SAFETY	Emergency Preparedness	Does the facility have legally required firefighting equipment?
145	hs-20--3-4x	HS-EME-9	HEALTH & SAFETY	Emergency Preparedness	Does the facility regularly test and service fire extinguishers and other firefighting equipment in line with legal requirements?
146	hs-20--6	HS-EME-11	HEALTH & SAFETY	Emergency Preparedness	Has the facility trained workers to use fire-fighting equipment in line with legal requirements?
147	hs-22-1x	HS-EME-13	HEALTH & SAFETY	Emergency Preparedness	Are there sufficient emergency exits from all work stations and rest areas, and on every floor?
148	hs-22-2x	HS-EME-14	HEALTH & SAFETY	Emergency Preparedness	Are all emergency exits clearly marked?
149	hs-22-4x	HS-EME-15	HEALTH & SAFETY	Emergency Preparedness	Are all emergency exits accessible, unobstructed and unlocked during working hours (including overtime) and lead to a place of safety?
150	hs-23--2	HS-EME-17	HEALTH & SAFETY	Emergency Preparedness	Are emergency exits in line with other legal requirements?
151	hs-23	HS-EME-18	HEALTH & SAFETY	Emergency Preparedness	Does the facility conduct regular emergency drills for all workers and are they in line with legal requirements?

152	hs-eme-11	HS-EME-21	HEALTH & SAFETY	Emergency Preparedness	Does the facility have a legally required Fire Brigade/Emergency Response Team of designated workers with special responsibilities for fire safety?
153	hs-che-13	HS-CHE-4	HEALTH & SAFETY	Chemicals and Hazardous Substances	Has all legally required action been taken to assess, monitor and prevent environmental exposure to chemicals and hazardous substances?
154	hs-26--1-2x	HS-CHE-8	HEALTH & SAFETY	Chemicals and Hazardous Substances	Are GHS compliant Safety Data Sheets ("SDS", formerly MSDS) available for all chemicals used in the workplace in line with legal requirements?
155	hs-26--1-4x	HS-CHE-9	HEALTH & SAFETY	Chemicals and Hazardous Substances	Are chemicals and hazardous substances stored in line with legal requirements?
156	hs-wor-8	HS-WOR-2	HEALTH & SAFETY	Worker Protection	Is required Health and Safety training for workers offered free of charge and does it take place during working hours?
157	hs-wor-9	HS-WOR-6	HEALTH & SAFETY	Worker Protection	Do any occupational safety and health measures, including collective measures or personal protective equipment, involve any cost to workers?
158	hs-32-11x	HS-WOR-16	HEALTH & SAFETY	Worker Protection	Does the facility have legally required and up to date permits/ certificates/ licenses for the installation/ operation/ maintenance of special machines and equipment (e.g., electrical installations, generator, boiler, other pressure vessels, lifting equipment, elevators and/or welding)?
159	hs-32-12x	HS-WOR-17	HEALTH & SAFETY	Worker Protection	Do operators/ technicians for machinery, equipment, electrical installations, boiler, lifting equipment, and/or welding have legally required license/ permit/ certification/ training?
160	hs-wor-17	HS-WOR-28	HEALTH & SAFETY	Worker Protection	Does the facility have any work areas with risk of heat or cold stress (extreme hot or cold temperature areas)?
161	hs-ele-14	HS-ELE-1	HEALTH & SAFETY	Electrical Safety	Are electrical wires, cables, switches, plugs, panels, distribution boards, and equipment (e.g. transformers, generators, compressors, circuit breakers) installed, grounded (for equipment), maintained and in line with legal requirements?
162	hs-42	HS-ELE-2	HEALTH & SAFETY	Electrical Safety	Is electrical equipment inspection and maintenance carried out by a certified, competent and authorized entity (i.e. is the electrician licensed) in line with legal requirements?
163	hs-fir-30	HS-FIR-5	HEALTH & SAFETY	First Aid and Medical	Are arrangements in case of medical emergency, including on-site medical facilities/clinic(s) and staff in line with legal requirements?
164	hs-fir-4	HS-FIR-7	HEALTH & SAFETY	First Aid and Medical	Are workers allowed access to on-site medical facilities at any time?
165	hs-52	HS-FIR-10	HEALTH & SAFETY	First Aid and Medical	Does the facility record work-related accidents and diseases and report them to the competent authority in line with legal requirements?

166	hs-55--1	HS-DOR-1	HEALTH & SAFETY	Dormitories	Are building/construction, structural safety and fire permits and certificates for housing/dormitories in line with legal requirements?
167	hs-55--3	HS-DOR-6	HEALTH & SAFETY	Dormitories	Are housing/dormitories in line with all other health and safety legal requirements?
168	hs-dor-26	HS-DOR-7	HEALTH & SAFETY	Dormitories	Are building/construction, structural safety and fire permits and certificates for off-site housing sites not managed and controlled by the facility in line with legal requirements?
169	hs-56--1	HS-CAN-1	HEALTH & SAFETY	Canteens	Are onsite canteens and eating areas in line with legal requirements?
170	hs-56--2-7x	HS-CAN-4	HEALTH & SAFETY	Canteens	Do food service workers have valid health/sanitation certificates/permits, as legally required?
171	hs-57--2	HS-CHI-1	HEALTH & SAFETY	Childcare	Are on-site childcare facilities in line with legal requirements?
172	hs-chil-1	HS-CHIL-1	HEALTH & SAFETY	Children	Are children below the legal minimum age for employment allowed in the production area, even if they are not working?
173	ter-for-3	TER-FOR-2	TERMINATION	Forced Labor	Does any worker owe debts related to their work to the facility and/or a third party?
174	ter-for-2	TER-FOR-3	TERMINATION	Forced Labor	Can workers who owe debts to the facility and/or a third party freely leave their jobs?
175	fl-14	TER-FOR-4	TERMINATION	Forced Labor	Has the facility ever withheld - or threatened to withhold - or delayed wage payments in order to keep workers at the facility?
176	fl-15	TER-FOR-5	TERMINATION	Forced Labor	Are workers free to terminate their employment after their notice period and/or contract expiry?
177	ter-dis-2	TER-DIS-1	TERMINATION	Discrimination	Have race, ethnic group, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign migrant worker status been a factor in decisions regarding termination, forced resignation, retrenchment or retirement?
178	disc-13	TER-DIS-4	TERMINATION	Discrimination	Has termination, forced resignation, retrenchment or retirement ever occurred due to a worker filing a complaint or taking part in proceedings against the facility?
179	ter-dis-4	TER-DIS-5	TERMINATION	Discrimination	Is the facility failing to comply with any legal requirements not covered elsewhere regarding Discrimination in Termination?

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## 9. Glossary, Acronyms and Definitions

This section provides definitions of key terms, concepts, and acronyms used throughout this guidance. These definitions are intended to support consistent understanding and application of the Converged Assessment Framework (CAF).

### Glossary

<b>Accredited Host</b>	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.
<b>Active Accredited Host</b>	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 process must be completed on one of the Active Accredited Host platforms and the facility can choose which Active Accredited Host platform they want to use.
<b>Converged Assessment Framework (CAF)</b>	The Data Collection Tool and verification methodology, developed by SLCP and downloadable from the Gateway. Consists of three elements: 1. Data Collection Tool; 2. Protocol (Facility, VB/ Verifier); and 3. Guidance (Facility, Verifier).
<b>CAF Assessment Process</b>	The SLCP procedure for implementing the Converged Assessment Framework, starting with self/joint-assessment for facilities, which is then verified by external parties. Verification oversight processes and methodology facilitate data sharing by the facility, Verifier and Accredited Host via the ITC Gateway.
<b>Data Collection Tool or “Tool”</b>	The ‘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 must 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 (for onsite verification only) via an Excel file downloadable from an Accredited Host. The Worker Engagement Question Set (mandatory for Full Virtual Verification) is a subset of the Data Collection Tool.
<b>Facility Guidance</b>	Online guidance provided to facilities, which is embedded in the SLCP Helpdesk. Different links can be accessed depending on whether the facility is inquiring about training, registration on the Gateway, completing a self-assessment, verification, data sharing or more general questions: <a href="https://slcp.zendesk.com/hc/en-us/categories/360000972694-I-am-a-Facility">https://slcp.zendesk.com/hc/en-us/categories/360000972694-I-am-a-Facility</a> , or if the facility is inquiring about the Converged Assessment Framework (CAF) more specifically: <a href="https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF">https://slcp.zendesk.com/hc/en-us/sections/360005179434-Converged-Assessment-Framework-CAF</a>
<b>Full Virtual Verification (FVV)</b>	The entire SLCP verification is conducted virtually due to situations of force majeure that restrict the ability of the facility to conduct onsite verification activities.
<b>ITC Gateway or “Gateway”</b>	The central repository of SLCP verified assessments. All verified assessments are stored safely on a UN server. Registered facilities always

	<p>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"> <li>1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material</li> <li>2. Account Management and unique IDs for facilities, VBs and Verifiers</li> <li>3. Management of statuses of the SLCP assessment cycle – by continuous updates with each of the Accredited Hosts. Facilities can always see the status of their SLCP assessment throughout and.</li> <li>4. Re(distribution) of verified assessments (VRF status) to Accredited Hosts and other ad-hoc users, with facility permission.</li> </ol>
<b>Joint-assessment</b>	Facility contracts outside help to fill in Data Collection Tool (CAF).
<b>Self-assessment</b>	Facility alone fills in the Data Collection Tool (CAF).
<b>SLCP</b>	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.
<b>Verification Oversight Organization (VOO)</b>	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, manages user complaints and investigations, manages confidential/sensitive issue reporting, 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, handles oversight of submitted addendums, and handles dispute resolution between a facility and a Verifier.
<b>Verification Protocol</b>	The document that contains the procedures, rules and process requirements for conducting all three SLCP validation methods (i.e., Onsite Verification, Virtual + Onsite Verification, Full Virtual Verification).
<b>Verified assessment</b>	Verified facility responses resulting from the CAF Assessment Process are generated into a report in pdf, Excel and html format. The verified assessment is made available to facilities and shareable by facilities on the ITC Gateway.
<b>Verifier</b>	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.
<b>Verifier Body</b>	The organization to which a Verifier belongs. Is responsible for assigning Verifiers when an SLCP verification is requested.
<b>Verifier Guidance</b>	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.
<b>Virtual + Onsite Verification</b>	Some parts of the verification are conducted virtually in addition to onsite verification activities.
<b>WE Question Set</b>	The SLCP Worker Engagement <a href="#">(WE) Question Set</a> is a subset of the Data Collection Tool. The Question Set consists of 20 questions aimed at supporting the questions in the Data Collection Tool.

<b>Worker Engagement Technology</b>	A digital platform for workers to directly report information in the form of worker surveys via automated calls or texts on mobile devices. The survey requires responses to a manageable set of questions related to working conditions. This technology also allows for two-way communication within an organization enabling facilities to provide workers with work related critical information (e.g., health and safety, complaints mechanisms).
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## Acronyms

Acronym	Meaning
AH	Accredited Host
APSCA	Association of Professional Social Compliance Auditors
ASI	Assessment Initiated
CAF	Converged Assessment Framework
FVV	Full Virtual Verification
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
VRE	Verification being Edited
VRF	Verification Finalized
VRP	Verification in Progress
VRQ	Verification Quality Check
WE	Worker Engagement
WE Tech	Worker Engagement Technology

## Definition of Terms

<b>Casual workers</b>	Persons who work occasionally and intermittently (irregular, on-demand, no guaranteed hours), and are employed for a specific number of hours, days or weeks. They are not normally entitled to the same terms and conditions of employment as ordinary workers (e.g., they would not usually get sick or holiday leave), but they may receive extra pay/ higher rate of pay than permanent or temporary workers to compensate for their lack of benefits.
<b>Contract workers</b>	Persons working on/with the facility's product or directly involved in the operations of the facility and who are contracted by agencies, i.e., not under employment contract with the facility. Examples include workers who are at the facility and employed by a third party to do line work or maintenance on machinery. They are not cleaning, security, canteen staff or other staff not working on facility product or activities related to production. Those workers are non-production workers.
<b>Domestic migrant workers</b>	Persons who moved from their hometown for work in another town located in the same country, i.e., persons whose hometown is not the town where the facility is located. A worker is a domestic migrant if they live in place X for work but their permanent home where their family resides is in place Y. However, if the location of the facility is considered 'home' then the worker would not be considered a domestic migrant.

<b>Foreign migrant workers</b>	Persons who moved from their home country for work in another country, i.e., persons whose home country is not the country in which the facility is located.
<b>Full-time workers</b>	Persons employed by the facility whose normal hours of work are 40-48 regular hours of work per week.
<b>Law Overlay</b>	<p>The Tool (offline and online) has information in the section introductions that address international labor standards applicable to that specific section/ sub-section topic. This is Law Guidance specific to international labor standards only. The Law Overlay is both the Law Guidance by country and the automatic entry of Non-Compliance and Legal Reference according to the Final Response in the Verification Summary.</p> <p>The Final Response is the Facility Self/Joint-Assessment Response if Accurate, or the Assessor/Verifier Response and Assessor/Verifier Explanation by the Verifier if the Facility Self/Joint-Assessment Response is Inaccurate – Incorrect or Inaccurate - Misunderstanding.</p> <p>On the AH platform, the users (facilities and Verifiers) will see a Law Guidance link (similar to More Info). When they go to that info box, they will see Law Guidance information about country specific legal requirements specific to that question. If Law Guidance at question level is implemented, then the automatic entry of Non-Compliance and Legal Reference is also implemented. The Law Overlay is both the Law Guidance field (country- and question-specific) and automatic entry of Non-Compliance and Legal Reference together as a package. See <a href="#">more information here</a>.</p>
<b>Non-production workers</b>	Persons not involved in the production of goods and in operations related to the product, e.g., distribution. Non-production workers include security guards, canteen workers and cleaners.
<b>Part-time workers</b>	Persons employed by the facility whose normal hours of work are less than those of comparable full-time workers. For statistical purposes, part time is typically defined by a specified number of hours. The threshold which divides workers into full-time and part-time workers varies from country to country but is usually either 30 or 35 hours per week.
<b>Permanent workers</b>	Persons hired on an open-ended/ indefinite/ permanent basis.
<b>Production</b>	Applies to all operations in a facility, since many facilities are not directly involved in “production” per se, (i.e., distribution centers, warehouses, etc.).
<b>Supervisors</b>	Persons who lead or supervise others and who work on the production floor (not in the office, e.g., line leaders, group leaders, and department heads, but not managers).
<b>Temporary workers</b>	Persons who are hired for a specific time, or to complete a specific task or project that is limited in duration (clear start and end dates). Limited duration can be specified in days, weeks, months, or years. Even if the contract duration is multiple years, as long as the contract defines a clear start and end date, these workers are considered temporary and not permanent. Temporary workers are different than casual workers (see definition for casual workers above).
<b>Workers</b>	Persons working on/with the facility’s product, ensuring machinery is working to produce product, or directly involved in the operations of the facility. They are non-supervisory, which means no one report to them (if a person is in a supervisory role, e.g., sewing line group leader, they would not be counted as “worker”). Facilities include those involved in production of goods, and also those involved in operations related to the product, e.g., distribution. Examples of “workers” are cutters, sewers, QC, packers, etc. (all workers who contribute to producing the product), boiler workers, mechanics (machine repair persons), electricians and workers who load product onto trucks.

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