

Social and Labor Convergence Program (SLCP) Verification Protocol Version 1.4-~~1.12.0~~* 1.12.0*

~~5 April 2021~~

~~This Verification Protocol applies to Version 1.4 of the Converged Assessment Framework.~~

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

~~Section 3 and Section 5 provide a list of mandatory requirements that Verifier Bodies/ Verifiers must follow. The added guidance to the requirements provides a thorough explanation of each mandatory requirement along with examples, support documents and recommendations.~~

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Disclaimer: This file represents only one aspect of the SLCP ~~assessment framework~~Converged Assessment Framework (CAF).
The file should be viewed in conjunction with the other 2 elements of the ~~Converged Assessment Framework~~.

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CAF: Data Collection Tool and Guidance (Facility, Verifier),
as well as the QA Manual.

*Version 2.0 of the Protocol for CAF v1.4

Change Log

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

Date	Section	Change Summary
2020/06/29	Entire document	Updating of hyperlinks and email addresses throughout the document Edits to make language clearer
2020/06/29	Entire document	Additions related to COVID-19, e.g., verification scheduling, onsite verification procedures, etc.
2020/06/29	New Annex III: COVID-19 – Enhancement to Verified Assessment Report Information	Annex III gives detailed instructions on how to include COVID-19 information, as applicable, in the self/joint-assessment and verification
2020/06/29	Terms of Use	New CAF Terms of Use as referenced on the Gateway
2020/06/29	Glossary	Additions to the Glossary
2020/06/29	Overview of the SLCP Assessment Process	Inclusion of short statement about Verification Data for “Accurate” items (more details included in Verifier Guidance) Updated graphic to explain the assessment process
2020/06/29	Eligibility of Verifiers	Clearer language about eligibility to conduct a verification Reference to Verifier Status Maintenance
2020/06/29	Details of the SLCP Assessment Process	Added new statuses of VRE, VRQ and made some additions/ changes to timeframes for edit/review by Verifier and facility Updated visual of SLCP assessment process with VRQ, VRE
2020/06/29	3.-5. Facility account creation on AH platform, initiating self/joint-assessment, completing self/joint-assessment	Note for newly operation facilities: min. 3 months data required in self-assessment
2020/06/29	7. VB assigns Verifier on Gateway	Ensuring meaning of no two verifications in a row by same Verifier is clear
2020/06/29	9. VB/ Verifier reviews self/joint-assessment to determine correct person-day requirements	More clarity on person-day assignments if step 1+2 or step 1+2+3 is selected
2020/06/29	11. Verifier reviews self/joint-assessment in detail to prepare for onsite verification, including facility background check	Background check addition: previous social audit/ SLCP reports
2020/06/29	14. Verifier conducts onsite verification (opening meeting, walk through, interviews, document review, closing meeting)	Additions to: <ul style="list-style-type: none"> o clarify potential change to person-days when onsite. o ensure all types of production employees are considered in verification o clarify language requirements o remind Verifier to add translator information in Verification Details o add detail around management interviews o cover the topic of denied access
2020/06/29	15. Verifier focuses on Verification Summary; addresses facility questions/ concerns during closing meeting	Addition of Verifier guidance around reporting verified assessment data to users other than the facility
2020/06/29	16.-20. Resolving facility concerns, filling in Tool, completing report online to run AH	Explanation of new statuses VRQ and VRE and Verifier responsibilities Recommendation for Verifier/ VB downloading of verified assessment report for document retention

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	checks, VB quality check, VRQ check with VRE edits, changing assessment status to VRC	
2020/06/29	21.-24. Facility reviews verified assessment, connects offline with Verifier/ VB for concerns and requests edits as necessary, accepts verification or raises Dispute	Explanation of new status VRE and Verifier responsibilities New timeframe for facility report finalization as multiple edit rounds can occur (14 calendar days instead of 10)
2020/06/29	Annex IV Verification Communication Template (suggested communication)	Revision to make it easier to read/ understand Addition of COVID-19 document reference
2020/06/29	Annex VII Additional On-site Verification Information	More details about what types of employees to interview Management Interview guidance
2021/03/07	Versioning	Introduction of versioning according to CAF Version Version 1.0 of the Protocol for CAF v1.4, hence Version 1.4-1.0
2021/03/07	Entire document	Reformatted and restructured to ensure verification related requirements are clear and clearly communicated as requirements See especially in particular chapter: 3. SLCP Verification Requirements
2021/03/07	Entire document	Removal of requirements/ information for facilities due to introduction of new CAF document: Facility Guidance
2021/03/07	Entire document	Addition of requirements from Verifier Guidance to separate “Guidance” from “Protocol” requirements
2021/03/07	New chapters: Acronyms Definitions of Terms	Helpful information for navigating SLCP terminology and definitions used in the Data Collection Tool
2021/03/07	3.1.4. Requirements for Calculating Number of Person-days, Interviews and Documents to Review Table 2: Determining Person Days, Number of Interviews and Sample Document Review	Person-day requirements have changed, along with minimum requirements for interviews, personnel records and wage and hours records review
2021/03/07	New chapters: 4. SLCP Virtual Verification Process 5. SLCP Virtual + Onsite Verification Requirements	SLCP is permitting additional aspects of verification to occur virtually (i.e., remotely through desktop, phone, web-enabled activities) Offsite desktop review for policies and procedures has been in place from the start, but now has expanded to include activities such as web-based payroll review, remote interviews and virtual walkthroughs

		Offsite review is now incorporated into virtual + onsite activity An SLCP verification still requires onsite activity with minimum 1 person-day
2021/03/07	Annex III COVID-19 – Inclusion of COVID-19 information in Verified Assessment Report	Updated with new Question numbers and text to reflect CAF v1.4 changes
2021/03/07	Annex IV Verification Communication Template (suggested communication)	Updated to include Facility Guidance and information about virtual/offsite/desktop + onsite verification
2021/04/05	Versioning	Version 1.1 of the Protocol for CAF v1.4, hence Version 1.4-1.1
2021/04/05	Correction of mistake under Guidance for 3.1.3.3.	Original: If the facility chooses more than Step 1 (i.e., Step 2 or Step 3), person-day requirements must be at least half a person-day more than the indicated Step 1 minimum. For example, if the facility has 1-100 workers, Step 1 minimum is 1 person-day, Step 2 minimum is 1.5 person-days, Step 3 minimum is also 2 person-days . Correction: If the facility chooses more than Step 1 (i.e., Step 2 or Step 3), person-day requirements must be at least half a person-day more than the indicated Step 1 minimum. For example, if the facility has 1-100 workers, Step 1 minimum is 1 person-day, Step 2 minimum is 1.5 person-days, Step 3 minimum is also 1.5 person-days .
2021/04/05	Correction of use of “employee” or “employees”	Several changes where “employee” was mentioned changed to “worker” instead. E.g., mistake under 3.2.1.1. where section was still listed as Employee Treatment and Employee Involvement. Changed to Worker Treatment and Worker Involvement.
2022/09/15	Versioning	Update CAF Version Version 2.0 of the Protocol for CAF v1.4, hence Version 1.4-2.0
2022/09/15	Definition of Terms	Definition of Terms now includes all types of workers (addition of “temporary”, “full-time” and “part-time).
2022/09/15	1.2. Overview of the SLCP Assessment Process	Process chart has been updated to remove Sedex
2022/09/15	Table 1 under 2.2.	Note added to explain VRP status under point 7. VRP status is not only when the Verifier is onsite but has already accepted the verification assignment via the Accredited Host. Verification in Progress encompasses verification preparation, verification activity, report writing and quality check.
2022/09/15	Section 2.3.4. and 3.1.3.3. Guidance edited to clarify calculation of person-days in minimum 0.5 person-day increments	Person days are calculated in minimum 0.5 person-day increments.
2022/09/15	3.1. Pre-onsite Verification	Text changed under 3.1.1.1. to clarify that this is in reference to onsite verification, as there are many other aspects of verification

	3.1.1. Requirements for Planning the Verification	that fall under the status of VRP.
2022/09/15	3.1. Pre-onsite Verification 3.2. Onsite Verification	Text added to guidance for 3.1.1.2. and 3.2.1.2. to explain what the Verifier must do if the Verifier arrives on site to discover a significant change in facility circumstances that affects the number of person-days, but the Verifier was not made aware of this prior to arriving onsite.
2022/09/15	3.1.1. Requirements for Planning the Verification 3.1.1.2. VB must confirm if any major changes to the workforce are permanent (e.g., terminations) or temporary (e.g., furloughs) to determine onsite time needed for verification	Text added to guidance to emphasize the Verifier’s responsibility to confirm if any changes have occurred to the size of the workforce when scheduling verification, as well as to confirm when onsite if information was not available prior to verification. These changes could impact person days as well as other requirements and should therefore be addressed prior to verification.
2022/09/15	3.2.1. General Onsite Verification Requirements	Guidance added to 3.2.1.3 to clarify how to assess facilities with one business license and multiple addresses, with reference provided to https://slcp.zendesk.com/hc/en-us/articles/360012552213-What-are-the-rules-around-creating-facility-profiles-on-the-Gateway-
2022/09/15	3.2.1. General Onsite Verification Requirements 3.2.1.2. The timeframe of the verification data must be based on the same previous 12 months from the date that the self/joint-assessment is completed by the facility 3.1.6. Requirements for Pre-verification Communication to Facility 3.1.6.3 During the scheduling process, the VB must discuss with the facility any changes in their workforce due to COVID-19 or other exceptional circumstances	Text added to guidance of each section to clarify what should happen if Facility Profile self/joint-assessment and actual circumstances during verification affect the person-day and/or other requirements.
	3.2.1.3. Guidance updated on verification scope for worker housing/ dormitory, and specifically also the use of dormitories not for workers onsite at facility premises	NOTE: Only housing used by workers (does not have to be exclusively used by them) is within scope of verification and must be part of the health and safety walkthrough by the Verifier. If housing is onsite at facility premises and not used by any workers, then at minimum, the Verifier shall answer the documentation-based question: “Are building/construction, structural safety and fire permits and certificates for housing/dormitories in line with legal requirements?” to provide the report user some information about the legality of the onsite housing arrangement.
2022/09/15	3.2.1.1 Guidance: automated Verification	Added reference to new automation feature for v.1.4.2 of the CAF, specifically with respect to “Not visible to facility during SA/JA” and adding reference to Section 3.3.3 Requirements for Report Writing for details on all new verification response

	<p>responses</p> <p>3.3.3.1 Guidance: automated Verification responses</p>	<p>automation features:</p> <p>Requirement 3.3.3.1 under 3.3.3 Requirements for Report Writing now lists the three new verification response automation features that are new for v1.4.2 – specifically “Facility did not reply during SA/JA”, “No longer applicable due to verification” and “Not visible to facility during SA/JA”. A detailed explanation to these automation features is also provided in the Guidance.</p>
2022/09/15	<p>Added “Note” to requirement 3.2.4.5 under 3.2.4. Worker and Management Interview Onsite Verification Requirements</p>	<p>Note adds clarity on verifying how many languages supervisors and management must speak in order to communicate effectively with ALL workers in the facility when verifying multilingual facilities</p>
2022/09/15	<p>Added recommendation under 3.2.5 Document Review Onsite Verification Requirements</p>	<p>Recommendation for Verifier to check that policy documents align with local laws. The text notes specifics on what is and what is not expected of the Verifier when checking legal alignment of policy documents.</p>
2022/09/15	<p>New point added to guidance for “3.2.5.1. Verifiers must review documents to understand the facility’s procedures and to verify specific claims about how the workforce is managed” under “3.2.5. Document Review Onsite Verification Requirements”</p>	<p>Point reads:</p> <ul style="list-style-type: none"> • Policy documents must be carefully reviewed to ensure that all policies are covered. Some policy documents include reference to a number of 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 number of 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.
2022/09/15	<p>3.2.5.2. Guidance updated to explain circumstance when Verifier must widen sample</p>	<p>Example 2: 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, then the Verifier must extend the sample to validate the facility’s information. The Verifier not finding overtime, does not necessarily mean that the facility did not have any overtime and the facility response is Inaccurate. The Verifier must ask the facility to present the records showing overtime so the Verifier can accurately reflect the facility circumstances.</p>
2022/09/15	<p>New requirement under wage and hours records requirements</p>	<p>3.2.5.3. When reviewing units for rate of pay, Verifier must include a breakdown of number of workers receiving each type of unit for rate of pay if the facility has more than one type of unit for rate of pay. This addition is so the user of the verified report can better understand the most common type of wage payment in the facility.</p>
2022/09/15	<p>Information added to “Situations of Denied Access” under 3.2.6. Document and Photo Attachment Onsite Verification Requirements</p>	<p>Added:</p> <ul style="list-style-type: none"> • Information on physical access denied to specific parts of the building or exclusion of entire buildings/ processes; • Information on general approach to Denied Access;
2022/09/15	<p>3.2.6. Document and Photo Attachment Onsite Verification Requirements</p>	<p>Text added to 3.2.6.1 guidance to clarify that Verifier is required to provide photographic evidence of issues identified as “Inaccurate” or “Non-Compliance” when physical evidence and observable issues permit.</p>
2022/09/15	<p>Added a note about Verifier intimidation under 3.2.8. Closing Meeting Onsite</p>	<p>3.2.8.4 now includes a point on Verifier intimidation when reporting results. The Verifier should remind the facility that SLCP does not make judgements about the data collected and it is in the facility’s best interest to report the most accurate data</p>

	Verification Requirements	possible. The Verifier has the right to end the verification at any point if the Verifier does not feel comfortable enough to continue. The Verifier should report any situations of intimidation to the VOO immediately.
2022/09/15	2.5.6. and 3.3.1.1. Requirement and Guidance	Edits to address both the 48-hour post verification period and the 14-calendar day review period as periods for report editing by the Verifier in response to valid facility concerns.
2022/09/15	Additional guidance for: 3.3.1.1. Verifier must address facility concerns within two days (48 hours) from end of onsite verification	Added text to read: • Important: Any legal non-compliance or inaccuracy determined at the time of the verification needs to be noted as a non-compliance and/or inaccuracy for the onsite verification. If the facility makes a correction before the end of the onsite verification, the Verifier can make a note in Verification Data that the facility already corrected/changed this data point, the outcome is xyz, a photo or another attachment can be added, but the Non-Compliance and/or Inaccuracy still remains. Example: The facility can say all our fire extinguishers are mounted but perhaps on that specific day of verification someone unmounted it and put it on the floor. Although it is a very easy fix it could be that workers are not trained to not touch the fire extinguishers; and, therefore, this needs to be reported. It is important to reflect what the Verifier saw/ determined before facility action, as the inaccuracy/ non-compliance may be repeated in the future due to it being a systemic issue.
2022/09/15	3.3.3. Requirements for Report Writing 3.3.3.1. Verification Selection must be completed correctly following the specific rules explained in the column "Guidance"	Clarification provided on why there is no "Corrected Response" option for Follow-up questions. As Follow-up Questions are free text responses, if the Verifier needs to revise or add to the Follow-up response the Verifier can do so in the Verification Data field. The option for a Corrected Response for Follow-up questions is therefore not available to the Verifier.
2022/09/15	3.3.3. Requirements for Report Writing 3.3.3.4. Verifier must adhere to applicable data privacy regulations	Added note to guidance: 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 Details.
2022/09/15	3.3.3. Requirements for Report Writing 3.3.3.6. Verifiers must provide details in "Verification Data" that clearly explain the reason for the specific Verification Selection and provide users of SLCP data with necessary information to inform post SLCP steps (including grading, certification and corrective action plans)	Note added at end to inform Verifier not to copy/paste formatted data from a source into the CAF Tool free text/ narrative boxes to avoid potential errors with certain characters. Additional examples added under the first bullet in section 3.3.3.6 to help direct Verifiers to sections that benefit most from adding Verification Data to responses that are accurate (e.g., Wages, Working Hours & Benefits, Recruitment & Hiring).
2022/09/15	3.3.3.10. Guidance updated to better explain "Misunderstanding"	Guidance updated with an example of what a Misunderstanding is and what it is not.
2022/09/15	3.4.2. Requirements for VB Document Retention	Added text to guidance explaining why the VB and Verifier do not have access to final verified report.

2022/09/15	3.4. VB Quality Check and Document Retention	Added "3.4.3. Requirements for VRF Edits" to end of section 3.4.
2022/09/15	End of section 3: SLCP Verification Requirements	Added new section: 3.6. Reporting on sensitive issues and suspicious activities outside of the Final Verified Assessment Report
2022/09/15	Section 4.1, addition to second last paragraph for virtual verification	Added reference to potential additional cost to facility for virtual verification due to a number of contributing factors.
2022/09/15	5.1.2.1. Guidance edited to better clarify possible Verifier combinations for virtual + onsite	Added clarification and examples to show possible Verifier assignments.
2022/09/15	Section 5.1.3 Requirements for Assigning Virtual Verification Activity Time. Clarification added to section 5.1.4 for number of person days allowed for onsite verification	Added last point to 5.1.3.1 to clarify that the same requirements apply for onsite verification after virtual activity as for verification using no virtual verification. Person days should not exceed 4-calendar days. First point of 5.1.4.1 now includes "(with or without virtual activities)" to make clear that 4 calendar days is the maximum time allowed for onsite verification activities whether facility is engaging in virtual + onsite or only onsite. The number of person days does not change.
2022/09/15	5.2.1. Verification Protocol Onsite Activities that can be Replaced by Virtual Activity	Added text to address feedback provided regarding virtual verification efficiency if the Verifier needs to double check documentation onsite that was reviewed virtually already. Text added to guidance for 5.2.1.4. to explain that facilities/Verifiers have to keep the systemic finding/ observation from virtual activity and cannot accept a "quick fix" in between virtual activity and onsite verification. Text addresses requirement to incorporate virtual findings into Verification Data narrative of the Tool.
2022/09/15	Clarification added to 5.2.1.12 Guidance for protection of worker identity for reviewing worker records virtually	Second bullet point added to guidance that recommends onsite interviews to be conducted prior to remaining record review so that interviewees are not known beforehand and there can be no influencing or coercion of interviewees.
2022/09/15	Added a box for "Section 6: commonly asked questions" at the end of Section 5	The new commonly asked questions box introduces and provides a link to the Verifier Q&A Airtable on the Sumerra website.
2022/09/15	Annex II Filtering of Verifier Body and Verifier	Second flow chart added as per Verification Protocol Version 1.3. Mistakenly omitted in 1.4-1.1 Version. Also, additional text added to clarify VB and Verifier selection.
2022/09/15	Annex VI SLCP Code of Conduct	"Members" replaced with "Verifier Bodies". "SLCP Competency Framework" deleted or replaced with QA Manual and VB Requirements, which encompass the competency framework.

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		Information added under "Handling of Sensitive Information".
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Terms of Use

Visit the [SLCP Gateway](#) for the CAF terms of use.

Pay special attention to:

- Rules of conduct and restrictions on permissible use
- Accuracy of Results
- Feedback and Third-Party Information

In case of questions: please contact info@slconvergence.org

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Glossary

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

“Passive Accredited Host” Third party/ external service provider approved by SLCP to 1) store SLCP assessment data on their platform and 2) provide additional data analytics and sharing services to users such as brands, standard holders, and manufacturers. The SLCP Gateway (central repository for all SLCP verified assessments) can submit data to a Passive Accredited Host if a facility initiates this sharing process. Only assessments in Verification Finalized (VRF) status are received by the Passive Accredited Host. The Passive Accredited Host is not involved in the active execution of the SLCP assessment process, i.e., self/joint assessment data gathering and verification data gathering.

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

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

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

“Data Collection Tool” or “Tool” Element 1 of the Converged Assessment Framework. ‘Questionnaire’ used to gather data on working conditions in a facility and used by the Verifier to verify this data. Contains all the assessment questions that a facility 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 through an Excel file downloadable from an Accredited Host.

“Facility Guidance” Element 3 of the Converged Assessment Framework. The document that helps facilities understand the SLCP process and complete the self/joint-assessment by giving guidance on how to enter facility responses into in the Data Collection Tool.

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

1. Central (and open) resource of Converged Assessment Framework, SLCP process and related information and support material

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

“**Self-assessment**” Facility alone fills in the Data Collection Tool (CAF Element 1).

“**Joint-assessment**” Facility contracts outside help to fill in the Data Collection Tool (CAF Element 1).

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

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

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

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

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

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

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

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Acronyms

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

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Definition of Terms

Casual workers	Persons who work occasionally and intermittently, 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).
Contract workers	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.
Domestic migrant workers	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.
Foreign migrant workers	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.
<u>Full-time workers</u>	<u>Persons employed by the facility whose normal hours of work are 40-48 regular hours of work per week.</u>
Law Overlay	<p>The Tool (offline and online) has information in the section introductions that address international labor standards that are applicable to that specific section/ sub-section topic. This is Law Guidance specific to international labor standards only.</p> <p>The Law Overlay is both the Law Guidance by country and the automatic entry of Non-Compliance and Legal Reference according to the final verified response.</p> <p>The final verified response is the facility response if Accurate, or the Corrected Response or Verification Data by the Verifier.</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. And if Law Guidance at question level is implemented</p>

	<p>also the automatic entry of Non-Compliance and Legal Reference is 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.</p> <p>See more information here.</p>
Non-production workers	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.
<u>Part-time workers</u>	<u>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.</u>
Permanent workers	Persons hired on an open-ended/ indefinite/ permanent basis.
Production	Applies to all operations in a facility, since many facilities are not directly involved in “production” per se, (i.e., distribution centers, warehouses, etc.).
Supervisors	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).
<u>Temporary workers</u>	<u>Persons who are hired for a specific time, or to complete a specific task or project that is limited in duration. Limited duration can be specified in days, weeks, months, or years. Temporary workers are different than casual workers (see definition for casual workers above).</u>
Workers	Persons working on/with the facility's 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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1. Introduction

1.1. Overview of the Converged Assessment Framework (CAF)

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

Data Collection Tool
<ul style="list-style-type: none">• Used by facilities and Verifiers• Records facility data and verification data on social and labor conditions in facilities• Executed through AH online platform (recommended) or through downloadable Excel from AH
Verification Protocol
<ul style="list-style-type: none">• Verification procedures and requirements for SLCP approved Verifier Bodies and Verifiers• Verifier Bodies and Verifiers receive and maintain SLCP approval by following procedures and requirements outlined in the SLCP Quality Assurance Manual
Guidance
<ul style="list-style-type: none">• Facility Guidance: to understand assessment process and complete the self/joint-assessment• Verifier Guidance: to understand how to write the verified assessment report

You can access the other CAF files on our [Helpdesk](#).

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The CAF is standard neutral. That means:

~~The CAF DOES~~

- ~~• collect self-reported demographic, compliance related and performance information from facilities~~
- ~~• employ a robust verification process~~
- ~~• facilitate operation (data hosting & sharing)~~

~~The CAF DOES NOT~~

- ~~• set minimum requirements~~
- ~~• act as a scoring/ranking system, certification program or Code of Conduct~~
- ~~• provide corrective action plans or engage in other follow-up actions~~

There is no judgment made on the data collected through the SLCP process. It provides objective data on the current social and labor conditions in a facility. This makes SLCP compatible with all compliance and certification programs. Users can use the data to come to their own conclusions and proceed with any applicable corrective action, remediation efforts or capacity/ capability building.

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1.2. Overview of the SLCP Assessment Process

Data Collection

Collection can be done by either:

- Self-assessment (facility only) or joint assessment (facility + external assistance)
- Online or offline by using the Data Collection Tool.

Self/joint-assessment can be carried out via an Excel document downloaded from the Accredited Host (AH) or online via an AH platform. If the facility has a stable internet connection, it is recommended to use the online AH platform to complete the self/joint-assessment.

The objective of the self-joint assessment is for the facility to enter complete and accurate data into the Data Collection Tool.

SLCP believes in facility ownership; therefore, it is the facility that starts the SLCP process and they maintain ownership of all data throughout the process.

Data Verification

The Verifier will check the correctness and completeness of the data gathered through the Data Collection Tool. They will confirm or provide corrections to the original self/joint-assessment data online on the AH platform or offline via an Excel document downloaded from the AH. If there is a stable internet connection, it is recommended to use the online AH platform to complete the verification.

The Verifier is required to verify each question in the Tool even if the facility did not provide an answer. See the Verifier Guidance for details on when to indicate “Accurate”/ “Inaccurate”/ “Updated during Verification” and other Verification Selection options in the Data Collection Tool. The Verifier must provide Verification Data to support corrected responses and is encouraged to provide Verification Data for “Accurate” responses where there is a legal non-compliance or a concern relating to general social compliance norms.

The Verification Oversight Organization (VOO) oversees the integrity of SLCP verification and ensures the quality of verified assessment data.

The objective of Data Verification is to ensure end-users’ acceptance of SLCP data and the replacement of their own audit methodologies with the SLCP process.

Data Hosting and Sharing

With facility permission, the verified assessment report will be shared through a semi-decentralized model with a Gateway and AHs.

The objective Data Hosting and Sharing is to enable a secure way of sharing verified data with users so multiple users can use the data to inform their (proprietary) social responsibility benchmarks and compliance programs.

- Online or offline by using the Data Collection Tool.

Self/joint-assessment can be carried out via an Excel document downloaded from the Accredited Host (AH) or online via an AH platform. If the facility has a stable internet connection, it is recommended to use the online AH platform to complete the self/joint-assessment.

The objective of the self-joint assessment is for the facility to enter complete and accurate data into the

document downloaded from the AH. If there is a stable internet connection, it is recommended to use the online AH platform to complete the verification.

The Verifier is required to verify each question in the Tool even if the facility did not provide an answer. See the Verifier Guidance for details on when to indicate “Accurate”/ “Inaccurate”/ “Updated during Verification” and other Verification Selection options in the Data Collection Tool. The Verifier must provide Verification Data to support corrected responses and is encouraged to provide Verification Data for “Accurate” responses where there is a legal non-compliance or a concern relating to general social compliance norms.

The Verification Oversight Organization (VOO) oversees the integrity of SLCP

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Data Hosting and Sharing

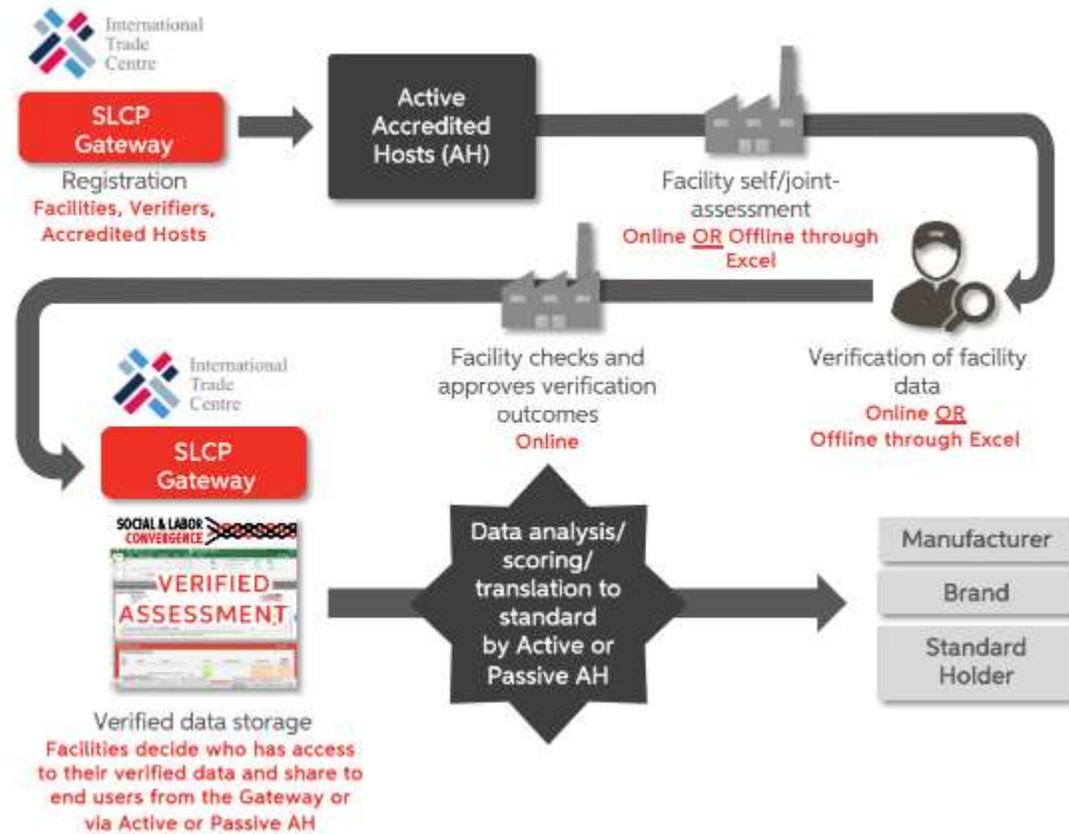
With facility permission, the verified assessment report will be shared through a semi-decentralized model with a Gateway and AHs.

The objective Data Hosting and Sharing is to enable a secure way of sharing verified data with users so multiple users can use the data to inform their (proprietary) social responsibility benchmarks and compliance programs.

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The SLCP assessment process:

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Note:

- The SLCP process begins with registration of all active parties on the Gateway.
- The Active Accredited Host is used to facilitate the data collection for self/joint-assessment and verification and sharing of verified data.
- The Passive Accredited Host only receives verified data from the Gateway, after completion of the full assessment process on an Active AH, and shares verified data with users. [Return to the top.](#)

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1.3. Structure of the SLCP Verification Protocol

The SLCP Verification Protocol is divided into five sections:

1. **Introduction:** This section provides the reader with an overview of the SLCP Converged Assessment Framework and the assessment process.
2. **SLCP Verification Process:** This section provides the reader with an overview of the different stages involved in the SLCP verification process. Within each stage there are links to the specific requirements in [Section 3: SLCP Verification Requirements](#) necessary for the VB/Verifier to meet in order to accurately complete the verification.
3. **SLCP Verification Requirements:** This section provides the reader with a set of mandatory requirements for the VB/Verifier to meet to complete the verification process. These requirements are accompanied by guidance and some recommendations to provide support to the VB/Verifier through the verification process.
4. **SLCP Virtual Verification Process:** This section explains the SLCP verification if virtual verification activities are included, and how the requirements for virtual verification will work in conjunction with requirements for onsite verification.
5. **SLCP Virtual Verification Requirements:** This section provides the reader with a set of mandatory requirements for the VB/Verifier to meet to complete the verification process if virtual activities are included. Links are also provided to the requirements in Section 3 that must be met together with the virtual verification requirements in order to successfully complete an SLCP verification with virtual activities. These requirements are also accompanied by guidance and some recommendations to provide support to the VB/Verifier through the virtual verification process.

The SLCP Verification Protocol is an interactive document. Links at the bottom of each section will bring the user back to the Table of Contents if the user wishes to go directly to another section of the document. Intra-sectional links are provided so the user can easily navigate between different sections and sets of requirements within the document.

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2. SLCP Verification Process

The SLCP Verification Protocol specifies procedures, rules and process requirements needed to complete the verification.

The SLCP process does not intend to determine to what extent working conditions in a facility comply with a certification or social compliance standard. Rather, the SLCP CAF is an agnostic data collection tool (not dependent on a particular standard) and reporting differs from traditional compliance auditing.

Therefore, we use specific terminology to underline this distinction. The SLCP program specifies:

- **Verification** rather than Audit or Assessment
- **Verifier** rather than Auditor

Audit: A systematic review or assessment of something

Verification: The process of establishing the truth, accuracy, or validity of something

Source: Oxford University Press

2.1. Characteristics of an Audit vs. SLCP Verification

Audit

- ~~Inspection by external party (2nd or 3rd party auditor) to assess social and labor conditions~~
- ~~Pass or fail regarding social and labor compliance requirements~~
- ~~Facility subject to audit process~~
- ~~Brand owns audit report and Corrective Action Plan~~

SLCP Verification

- ~~Verification of facility self/joint-assessment of social and labor conditions~~
- ~~Agnostic data collection without judgment~~
- ~~Facility is active participant in verification process, e.g. by providing facility information upfront~~
- ~~Facility owns verified assessment report (facility permission needed for data sharing)~~

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2.2. Details of the SLCP Assessment Process

In the [Overview of the SLCP Assessment Process](#), we present the three main parts to the SLCP assessment process. Now, we dive deeper into the process and present the:

- Activities/ actions of all SLCP actors
- SLCP assessment status associated with each applicable action
- Estimated timeline associated with each action.

More information, if applicable, to each Action Number will be presented in Table 1 below.

2.2.1. SLCP Statuses

ASI- Assessment Initiated	ASC- Assessment Completed				
VRP- Verification in Progress	VRQ- Verification Quality Check	VRE- Verification being Edited	VRC- Verification Completed	VRF- Verification Finalized	
VRD- Verification Disputed	VRI- Verification Invalidated				

2.2.2. SLCP Actors

F- Facility	V- Verifier	VB- VB Verifier Body	GW- Gateway	AH- Accredited Host	VOO- Verification Oversight Organization
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Table 1: SLCP Statuses

NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
1.	Facility creates an account on Gateway		✓	✓	✓	✓			<p>Week 0</p> <p>All steps before Week 0 are prior to the start of the verification process. Note it takes facility on average 2 weeks to complete self/joint-assessment as Tool is complex and multiple individuals may be required to provide input/ documentation</p>
2.	Facility discusses verification cost/timeline offline with VBs Note: verification can be semi-announced with a 10-day window and cost/timeline will likely be estimates as self/joint-assessment information is needed to determine exact person-day requirements for verification		✓		✓				
3.	Facility creates account on Accredited Host platform using Facility ID from Gateway		✓				✓		
4.	Facility accesses Data Collection Tool through AH and initiates self/joint-assessment	ASI	✓				✓		
5.	Facility completes self/joint-assessment; recommend online completion but download into Excel from AH is available with final step of upload to AH required	ASC	✓				✓		
6.	Facility selects VB to conduct verification on Accredited Host platform	ASI or ASC	✓				✓		

¹ There are various factors that impact the actual assessment process timeline. This is the recommended timeframe. It is not a strict requirement unless explicitly noted in subsequent sections of the Protocol (e.g., time allowed between completion of self/joint-assessment and the onsite verification).

NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
7.	<u>VB assigns Verifier on Gateway</u> <u>VB assigns Verifier on Gateway and Verifier accepts assignment on the applicable Accredited Host platform (Note: VRP status already starts at this point and continues all the way until the Verifier has finished its verification with the facility and has written the report. Once the report is submitted and has passed the SLCP automated quality check, the status changes from VRP to VRC. Status VRP can last several weeks.)</u>	VRP			✓	✓			Week 1
8.	VB/Verifier obtain access to non-editable/ locked self/joint-assessment data on AH platform along with documents the facility uploaded	VRP		✓	✓		✓		
9.	VB/Verifier reviews self/joint-assessment to determine correct person-day requirements	VRP		✓	✓		✓		
10.	Verifier reviews self/joint-assessment in detail to prepare for verification, which includes facility background check	VRP		✓			✓		Typically, no earlier than week 3 Typically, no later than week 7 Note self/joint-assessment must be delivered to Verifier at least 10 working days prior to scheduled virtual and/or onsite visit. Some VBs may need up to 4 weeks advanced notice to schedule verification, as Verifier schedules are booked well in advance.
11.	Verifier or VB provides pre-verification communication to facility, including document list and verification planning information according to Verification Protocol requirements (note any virtual verification activity also requires a verification plan)	VRP	✓	✓	✓				
12.	Verifier conducts virtual verification activities, if applicable (activities such as offsite documents review,	VRP	✓	✓					

NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
	virtual interviews, virtual walk-through)								
13.	Verifier downloads Data Collection Tool from AH platform with non-editable/ locked self/joint-assessment data for back-up during onsite verification in case AH platform connectivity issues occur	VRP		✓				✓	<p>Typically, no earlier than week 4 Typically, no later than week 8</p> <p>Note Verifier availability may require up to 4 weeks advanced notice and verification can be semi-announced with 10-day window</p>
14.	Verifier conducts onsite verification following Verification Protocol requirements, including opening meeting, document review, interviews, facility walk through, and closing meeting	VRP	✓	✓					
15.	Verifier focuses on entering “Updated during Verification”, “Inaccurate” and “Non-Compliance” data to inform Verification Summary and prepare for closing meeting; verification is completed online or in downloaded Excel offline; Verifier addresses any facility questions/ concerns during closing meeting	VRP		✓			✓		
16.	Verifier or VB resolves any further facility concerns/questions about verification within a maximum of 48 hours after onsite verification is completed, then proceeds with filling in the Data Collection Tool (recommend online)	VRP	✓	✓	✓		✓		
17.	Verifier uploads offline verification to online AH platform and/or fills in verification online and follows Accredited Host automated checks/flags for proper completion	VRP		✓			✓		
									Typically, no earlier than week 6 Typically, no later than week 10

NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
18.	VB conducts quality check of Verifier's Verifier's work and either Verifier or VB changes the assessment status to "Verification Completed" on AH platform	VRC		✓	✓		✓		
19.	Automated Data Quality checks are performed on the verified assessment data submitted by the Verifier	VRQ				✓	✓	✓	
20.	If VRQ fails, the Verifier reviews the failures on AH platform and makes necessary edits and -again- changes status to "Verification Completed" on AH platform	VRE		✓			✓		VRQ failures are almost immediately submitted to Verifier after Verifier completes verification (VRC); Verifier can choose to immediately review and make changes and submit again to VRC or after 4 calendar days status automatically changes from VRE to VRC with or without edits by Verifier
21.	Facility reviews the verified assessment online or offline in Excel by downloading from AH. The facility has 14 calendar days to review and request edits from the Verifier before facility's manual finalization by changing status to VRF or AH's automated finalization on calendar day 15.	VRC	✓				✓		
22.	Facility reaches out to VB/Verifier directly (offline/email) with any concerns/questions about the verification data. Once edits are agreed between VB/Verifier and facility, facility changes its status from VRC to VRE to allow Verifier access to the assessment for edits.	VRC and maybe VRE	✓	✓	✓		✓		
23.	Verifier reviews facility concerns/questions and edits the assessment as agreed. Verifier changes status to VRC so	VRE then VRC	✓	✓			✓		Typically, no earlier than week 8

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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
	facility can review the edits and request further changes if necessary. Status change from VRC to VRE to VRC can occur as often as necessary within the 14 calendar days. On calendar day 15 the process ends and the assessment changes to VRF, unless the facility manually changes to VRF before 14 calendar days are complete.								Typically, no later than week 12
24.	Facility changes assessment status to “Verification Finalized” by accepting the verification. If facility has any complaint about the Verifier following procedure or about Verifier conduct, facility opens a “Dispute”. If facility takes no action, assessment status automatically changes to VRF after 14 calendar day review and edit period ends.	VRF or VRD	✓				✓		
25.	In VRF, facility can share the accepted verified assessment via the Gateway and/or the Accredited Host with other users and other AH platforms	VRF	✓			✓	✓		
26.	If Dispute opened, VOO evaluates the validity of the Dispute and accesses the verified assessment data via the Gateway; facility can only open Dispute process once	VRD	✓			✓		✓	Typically, no earlier than week 11 Typically, no later than week 15
27.	If Dispute substantiated, depending on the outcome: o VOO invalidates verified assessment (VOO notifies facility and 4 calendar days later changes to VRI) OR	VRI or VRE and VRC	✓	✓	✓	✓	✓	✓	Note: VOO evaluates validity of Dispute within 2 working days. If substantiated, VOO attempts to resolve Dispute within 10 days and gives 4 calendar day notice prior to change to VRI

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NO.	ACTION	SLCP STATUS	ACTORS						ESTIMATED TIMELINE ¹
			F	V	VB	GW	AH	VOO	
	o VOO returns assessment to Verifier for edits and final facility review (Verifier and facility have 5 calendar days to make edits and review)								
28.	If Dispute not substantiated, VOO finalizes verified assessment and changes status to VRF after 4 calendar day notice to facility; see point 25 for next steps.	VRF				✓		✓	
29.	<p>Note that in VRF, the VOO can choose to conduct quality assurance procedures for any verified assessment.</p> <p>The 14 days noted in Action 23 are back and forth between facility and Verifier before VRF. Once in VRF, the VOO will conduct sample-based QA activity. The VOO will use the VRQ data to check on VB quality review processes, but the VOO is not involved in the 14-day back and forth between the facility and the Verifier.</p> <p>Outcome of this verification oversight activity may result in invalidation of a verified assessment.</p>	VRI				✓		✓	<p>Typically, no earlier than week 16</p> <p>Typically, no later than week 22</p> <p>Note duplicate verifications</p> <p>(a more intensive QA procedure) can take 8-10 weeks after VRF to complete</p>

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2.3. Pre-Onsite Verification

Following is an explanation of each stage of the SLCP pre-onsite verification process. Each stage has a set of mandatory requirements that the VB/Verifier must follow. These requirements are set out in [Section 3](#) of the SLCP Verification Protocol, and each section below provides a [link](#) to the accompanying requirements.

2.3.1. Account Maintenance on Gateway

As an approved VB, you will be assigned a [Gateway](#) account. For more information on SLCP VBs go to slconvergence.org/verifierbodies. To start a VB application, go to the [VB Application Page](#).

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2.3.2. Planning the Verification

The list of SLCP approved VBs available for the specific verification becomes visible on an Accredited Host platform once the facility requests a verification. Eligibility is based on whether the VB is operating in the country in which the verification will take place and which languages the VB can support through its Verifiers.

Prior to VB selection, the facility should have had offline conversations with VBs regarding quotes and services. If COVID-19 is a concern, the VB should reference [Annex III](#) to educate facilities on how to incorporate specific information into the self/joint-assessment and how the Verifier is going to address COVID-19 in the verified assessment report. Once agreement is reached (offline/email) between the facility and the VB, the facility selects that VB on the Accredited Host platform.

Please refer to [Annex II](#) for more information on how VBs are designated eligible for a specific facility.

The facility initiates and completes the self/joint-assessment. Modules 3 and 7 of the SLCP e-learning explain these actions in detail.

See [3.1.1. Requirements](#).

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Changes in workforce, processes, operations due to COVID-19

If the facility has experienced a change of 50% or more of their workforce since the date of completion of their self/joint-assessment as a result of COVID-19 or for any other reason, the VB must advise the facility to review and update the self-assessment.

Closer to the verification, VBs should ensure that the processes on which the facility self-reported will be in operation during the verification (e.g. if certain parts of what the facility does are not operational, it is **recommended** that the verification NOT take place; however, it does NOT mean that the verification MUST NOT take place. Ultimately, it is up to the facility to decide if they want the verification to take place. SLCP recommends that all operations be active to show a full picture, but if the facility wants the verification with only part of production active, then the Verifier can complete the verification as such. The Verifier must make note of this in the report in the Verification Details section, at a minimum.

If all parts are in operation, just at decreased capacity, then the verification can take place. The VB/ Verifier can guide the facility to make the best choice by asking them if they have considered the users of the verified data and if all users would accept the limited operations of the facility.

by asking them if they have considered the users of the verified data and if all users would accept the limited operations of the facility.

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2.3.3. Assigning a Verifier

To ensure data integrity and prevent bias, the facility cannot choose the SLCP approved Verifier. Rather, the VB assigns the SLCP approved Verifier to a verification. They do this on the Gateway where a list of SLCP approved Verifiers is available for selection.

See [3.1.2. Requirements.](#)

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2.3.4. Assigning Person-days

SLCP has specific requirements for the VB/Verifier when determining the number of person-days needed for an onsite verification, such as the maximum number of calendar days allowed, involvement of virtual verification activities, defining a person-day, and Verifier selection. Note: Person days are only related to verification (either onsite or virtual) not scheduling, research, report writing, edits during the 14--day review period, and other activities required of the Verifier. Person days are calculated in minimum 0.5 person-day increments.

See [3.1.3. Requirements.](#)

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2.3.5. Calculating Number of Person-days, Interviews and Documents to Review

When the VB/Verifier determines the number of person-days, interviews and documents necessary to conduct the verification, they must follow the specific methodology laid out in [Table 2](#). This table clearly explains how many person days, interviews and documents will be needed based on:

- Absence of any virtual verification activity (i.e., no offsite or virtual documents review, interviews, and walkthrough),
- Number of workers in the facility, and
- Specific Step (Step 1, Step 2 or Step 3) the facility completes in the self/joint-assessment. Step to verify must match the self/joint-assessment Step selected.

For calculation of person-days, interviews and documents to review *with* virtual verification activity, refer to [5.1.4. Requirements](#).

See [3.1.4. Requirements](#).

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2.3.6. Review of Self/Joint-Assessment

The Accredited Host platform is configured to ensure the self/joint-assessment is completed according to SLCP minimum requirements to proceed to the next step of verification.

At this point, it is likely that the VB has already provided the facility with a cost and person-day estimate for the verification. However, the VB can only accurately determine how many person-days are needed and if virtual verification activity requested by the facility is actually possible once they have access to the self/joint-assessment and, with it, any documents the facility attached to the self/joint-assessment.

Depending on how much data there is to verify, the VB/Verifier may change the person-day estimates. For example, a facility that chose Step 2 and answered Management System questions may only have very few policies in place and will therefore require less time than a facility with more policies to review. **Note: the person-day estimate does not include review of the self/joint-assessment.**

See [3.1.5. Requirements](#).

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2.3.7. Pre-verification Communication to Facility

SCLP provides details on what is required of the Verifier in communicating the verification plan to the facility. Requirements related to this process include timelines and specifics to be included in the verification plan. **Note: the person-day estimate does not include development of the verification plan.**

See [3.1.6. Requirements](#).

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2.3.8. Download Back-up of Data Collection Tool from AH platform

SLCP recommends downloading the offline Excel Tool in verification mode with the facility self/joint-assessment completed from the Accredited Host platform. This provides the Verifier with an offline back-up to complete verification data and the Verification Summary in case the Verifier experiences Internet connectivity issues during the onsite verification and cannot access the AH platform.

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2.4. Onsite Verification

The Verifier verifies all the responses that are applicable to the facility according to the Step chosen in the self/joint-assessment. The Step scope to be verified must match the self/joint-assessment Step selected. **It is therefore important to review the self/joint-assessment Step selection prior to the onsite verification to ensure the facility and the Verifier have agreed on verification of the correct Step selection.** It is also the Verifier's responsibility to ensure that all questions have the correct answer, which means that if the facility did not provide a correct answer, or did not provide an answer at all, the Verifier **provides must provide** the correct information.

The onsite verification consists of an opening meeting, a workplace walkthrough, worker and management interviews, documentation review, a pre-closing and a closing meeting. The purpose of the walkthrough and interviews is to observe workplace health and safety practices and verify the implementation of policies and procedures. The opening and pre-/closing meetings facilitate communication, clarification and transparency between the Verifier and facility.

Refer to [Annex VII](#) for tips concerning the onsite walkthrough, and worker and management interviews. Examples of instances for document/photo attachments are noted in the [Verifier Guidance](#). See [Section 3.2](#) for the SLCP requirements and guidance for the onsite verification process. **For general onsite verification requirements, see [3.2.1. Requirements](#).**

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2.4.1. Opening Meeting Onsite Verification Requirements

An SLCP onsite verification begins with an opening meeting. Whenever possible, the opening meeting should include all parties involved in the SLCP assessment process: facility management, workers' representatives and those individuals responsible for managing recruitment, contracts, wages, and health and safety. The opening meeting involves discussions around verification objectives, scope and methodology. SLCP requirements for the opening meeting also include agenda recommendations. See [3.2.2. Requirements](#).

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2.4.2. Walkthrough Onsite Verification Requirements

The Verifier performs a walkthrough of the entire facility/workplace to observe facility practices. **Throughout the verification**, the Verifier informs facility management about any inaccuracies, notable verification data entries and any legal non-compliances.

See [3.2.3. Requirements](#).

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2.4.3. Worker and Management Interviews Onsite Verification Requirements

The Verifier interviews a sample of workers and all management staff responsible for social and labor activities/ policies/ procedures at the facility. See [3.1.4. Requirements](#) for calculating number of worker interviews.

See [3.2.4. Requirements](#).

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2.4.4. Document Review Onsite Verification Requirements

The Verifier conducts document review of policies and procedures as well as records such as wages and working hours, employment records, formal complaints, etc. See [3.1.4. Requirements](#) for calculating number of wage, hours and personnel records to review.

See [3.2.5. Requirements](#).

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2.4.5. Document and Photo Attachment Onsite Verification Requirements

When there is documentation or photographs that can be attached as evidence/ information alongside the applicable question, the Verifier will attach the files via the Accredited Host platform.

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See [3.2.6. Requirements](#).

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2.4.6. Pre-closing Meeting Onsite Verification Requirements

This provides the Verifier time to complete the Verification Summary. Depending on the scope/breadth of inaccuracies and non-compliances, the Verifier may not have had time to complete all **“Inaccurate”, “Non-Compliance” (for Verification Summary) and “Updated during Verification”** items needed to prepare for the closing meeting. The Verifier takes this time to complete as many of the entries that will allow the Verifier to have a productive closing meeting with the help of the Verification Summary.

See [3.2.7. Requirements](#).

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2.4.7. Closing Meeting Onsite Verification Requirements

The closing meeting should include the same individuals who were present during the opening meeting. During this meeting, the Verifier reviews the scope of the work performed and highlights any discrepancies (gaps) between the self/joint-assessment and the verification outcomes so that the facility can understand how to better complete the Data Collection Tool the next time. SLCP requirements for the closing meeting also include agenda recommendations.

See [3.2.8. Requirements](#).

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2.5. Post-onsite Verification

2.5.1. Resolving Facility Concerns

The VB/Verifier may have to address facility concerns about the verified data. SLCP has specific processes and requirements for the VB/Verifier when following up with the facility on any issues raised.

See [3.3.1. Requirements](#).

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2.5.2. Report Writing

The Verifier/VB has 10 working days after end of onsite verification to complete the verified assessment report. Filling in the Tool to complete the report can occur online or offline, but the process must end online as the Accredited Host runs checks to ensure proper completion of the Tool. These checks focus on content being entered for mandatory fields or in a specific type of format. These checks do not include the level of quality of data, which is the responsibility of the Verifier and the VB when it runs mandatory quality checks. Note: report writing time is not included in the number of person-days required for verification of the facility. Person days are only related to verification (either onsite or virtual) not scheduling, research, report writing, edits during the 14--day review period, or any other activities required of Verifier.

More information about how to complete the Tool and tips on quality review are in the [Verifier Guidance](#).

Focus on “Verification Data” Narrative

SLCP data has to be clear, applicable to the question at hand, and factual, so that multiple users can easily adopt the data and apply their own standards. Even though SLCP verified data is standard agnostic, we still need to provide the necessary data for standard holders and brands with codes of conduct to assess compliance and inform remediation activity/corrective action plans.

! The “Verification Data” narrative is an extremely important element of the verification process and Verifiers need to understand what is expected from them when completing this information. The requirements for “Verification Data” Narrative are outlined in 3.3.3. Requirements. Make sure to read the Guidance which explains how to approach each Verification Selection.

This means, it is the responsibility of the Verifier to produce a detailed explanation in “Verification Data” so that the user of the verified assessment report has the necessary information to make an informed decision, including, e.g., -grading/ ranking/ passing/ failing/ certifying a facility and/or providing the facility with a Corrective Action Plan.

Based on the Verifier’s experience in social auditing, the Verifier may identify a response that, whether “inaccurate” or “accurate”, is in violation of an industry standard or code of conduct. For the user of the report to properly inform remediation efforts, “Verification Data” needs to include explicit details of the facility’s circumstance; details that are clear, applicable to the question at hand, and factual.

~~The “Verification Data” narrative is an extremely important element of the verification process and Verifiers need to understand what is expected from them when completing this information. The requirements for “Verification Data” Narrative are outlined in 3.3.3. Requirements. Make sure to read the Guidance which explains how to approach each verification selection.~~

See [3.3.3. Requirements](#).

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“More info” is a valuable resource, and we recommend referencing this information anytime anything seems unclear.

Examples of the types of explanatory information provided in “More info” include:

- Calculation methods for measurement or distance questions
 - Legal compliance questions
 - Distinctions for clarity across similar questions
 - Details on types of programs (e.g. financing programs)
 - Appropriate answers based on specific scenario (e.g. if the facility provides a weekly rest day, but not for 20 consecutive hours, answer “No”)
 - Definition/explanation of terms
 - The overall intent of the question.
- The overall intent of the question.

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2.5.3. VB Quality Check

The VB is responsible for conducting an internal quality check and ensuring the Verifier’s quality of work is in accordance with the Verification Protocol Requirements and provided Verifier Guidance.

Failures in the VB Quality Check process may be discovered when the Verifier changes the status from VRP to VRC, which triggers the status of VRQ. If quality failures are present the status of the assessment goes to VRE. It is the responsibility of the Verifier to ensure all quality issues are resolved prior to (re-)submitting to status VRC.

See [3.4.1. Requirements](#).

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2.5.4. VB Document Retention

VBs must follow local legal requirements relating to the minimum retention of notes, documents, photographs and/or client files. SLCP requires at least 12 months of retention to facilitate any Dispute or quality assurance procedures.

Note: ~~as the Verifier and VB do not have access to the~~ Although Verifiers can request a copy from the facility, SLCP recommends Verifiers save a copy of the finalized verified assessment report (status VRF), ~~Verifiers should save a copy of the report (likely the offline Excel version) for their records prior to changing the status to “Verification Completed”. VBs can always ask the facility to share the finalized verified assessment report with them, but SLCP recommends downloading a copy at this point in the SLCP assessment process.~~ VRC” since Verifiers and VBs do not have access to the report (status VRF).

See [3.4.2. Requirements](#).

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2.5.5. Facility Reviews Verified Assessment Report

~~Once~~ The facility is notified via the Accredited Host platform once the Verifier completes the verification report (for the first or second time after VRQ failures), ~~the facility is notified via the Accredited Host platform.~~ The facility can review the verified assessment report by accessing it online or downloading it as an offline Excel from the Accredited Host platform. The facility then has 14 calendar days to review the report and request edits from the Verifier/VB, as necessary.

See [3.3.2. Requirements](#).

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2.5.6. Facility Responds After Review of the Verified Assessment Report

The facility has 14 calendar days to review the verified assessment report and ensure the report is correct and of high quality. During this time, the facility ~~can~~ has the option to:

- **Accept the verified assessment report** on the Accredited Host platform, which changes the assessment status from “Verification Completed” (VRC) to “Verification Finalized” (VRF)
- **Dispute the verified assessment report** due to the Verifier not following Verification Protocol or complaints about Verifier conduct. This changes the assessment status from “Verification Completed” (VRC) to “Verification Disputed-” (VRD). When raising the Dispute on the Accredited Host platform, the facility will have to provide more detailed information about the Dispute, so the Verification Oversight Organization is well informed
- **Reach out to the Verifier/ VB for clarifications, concerns** (e.g. regarding the quality or content of the report), or questions about **the verified assessment report**, especially with regards to verification data issues (i.e., Verification Selection, Corrected Response, Verification Data, Non-Compliance, Legal Reference) that **do not** relate to the Verifier following the Protocol or to Verifier conduct

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- **Change** the status from “Verification Completed” ([VRC](#)) to “Verification being Edited” ([VRE](#)) if the facility and Verifier/ VB have jointly agreed to report edits.

After 14 calendar days, if the facility has not accepted the verification or raised a Dispute, the Accredited Host automatically changes the status of the assessment to “Verification Finalized”.

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2.5.7. Raising a Dispute

Once the facility raises a Dispute, the Verification Oversight Organization is notified about the Dispute and receives the details of the Dispute via the information the facility filled out on the Accredited Host site.

For more information about the Dispute process, access the [SLCP Quality Assurance Manual](#).

An assessment that is in “Verification Invalidated” ([VRI](#)) status cannot be shared with end users and the full report is not available on the Accredited Host site or Gateway. The only information available is that the facility has an invalidated report and the reason the report was invalidated.

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2.5.8. Facility Shares Verified Assessment via the Gateway and/or the Accredited Host

Once the facility has accepted the verified assessment report, it can then share the report via the Accredited Host site and/or Gateway.

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2.6. *In line with legal requirements*

2.6.1. Identifying and citing when facility is not in line with legal requirements

SLCP does not come to any conclusions on compliance with any brand’s code of conduct or any certification standard. However, this does not mean that the Tool is completely void of reference to any type of standard. SLCP actually requires the facility and Verifier to reference applicable legal requirements when answering questions. For the Verifier this applies to all questions outside of the Facility Profile section.

Any incidence of Non-Compliance (no matter the Verification Selection or Corrected Response) will be reflected in the Verification Summary for easy reference.

2.6.2. Tool meaning of “Consult applicable legal requirements”

This Tool is aligned with international labor standards and national laws.

Any time a question references the law (e.g. “in line with legal requirements”, “legally required”), the facility (and Verifier) must consult applicable legal requirements to assess the answer (verified answer) to the question. “More Info” provides instructions on what to do if there are no applicable legal requirements.

Applicable legal requirements include:

- The ILO Core Conventions in force in the country in question
 - The ILO Core Conventions provide the baseline for determining compliance with the fundamental rights at work:
 - Child Labour (C138 Minimum Age Convention, 1973 and C182 Worst Forms of Child Labour Convention, 1999)
 - Discrimination (C100 Equal Remuneration Convention, 1951 and C111 Discrimination (Employment and Occupation) Convention, 1958)
 - Forced Labour (C29 Forced Labour Convention, 1930 (and Protocol) and C105 Abolition of Forced Labour Convention, 1957)
 - Freedom of Association and Collective Bargaining (C87 Freedom of Association and Protection of the Right to Organize Convention, 1948 and C98 Right to Organize and Collective Bargaining Convention 1949)
- Other conventions in force in the country in question
- Laws and regulations that apply in the jurisdiction in question
- Collective Bargaining Agreements: Where the provision in question is at least as favorable for workers as relevant legal requirements
 - ~~Where the provision in question is at least as favorable for workers as relevant legal requirements~~

! If applicable legislation does not cover or sufficiently address an issue regarding compensation, contracts, occupational safety and health or working time, other benchmarks based on international standards and good practices may be used, where these are derived from international instruments, or materials developed within the ILO and in consultation with tripartite constituents.

Applicable legal requirements are set out in the “[Law Overlay](#)” for select countries.

~~If applicable legislation does not cover or sufficiently address an issue regarding compensation, contracts, occupational safety and health or working time, other benchmarks based on international standards and good practices may be used, where these are derived from international instruments, or materials developed within the ILO and in consultation with tripartite constituents.~~

NOTE: If not required by law but the facility still addresses a specific issue (e.g., time off for breastfeeding), the Verifier selects “No applicable requirements” and notes down in Verification Data that the facility addresses the issue regardless of the absence of legal requirements.

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2.7. Law Guidance and Law Overlay

2.7.1. Data Collection Tool “Law Guidance” and Automated Entry of Non-Compliance and Legal Reference

Law Guidance will be provided by ILO-Better Work for select countries and only for Step 1 scope. Information on country-specific laws will be attached to each applicable question in Step 1 *on the*

Accredited Host platform. Similar to More Info, the facility and Verifier will have access to country-specific Law Guidance on the Accredited Host platform.

For offline use, facilities and Verifiers will have access to an Excel document that contains, in a flat file, all applicable law guidance by country and by Tool question.

Note, there is Law Guidance in the offline Excel Tool, but it is only contained in the Section Instructions and Sub-Section Instructions and only references international labor standards, i.e., it is not country specific.

Law Guidance informs the SLCP Law Overlay. If the Final Verified Response determined by the Verifier results in a Non-Compliance, and ILO-Better Work has provided Law Guidance to SLCP for that specific country in which the verification is taking place, then the automatic Law Overlay will be implemented on the Accredited Host platform.

- Final Verified Response means the facility response if the Verification Selection is “Accurate” or it is the Verifier’s Corrected Response or Verification Data entry.
- Automatic Law Overlay means upon determination of the Final Verified Response, the Accredited Host will automatically complete the Non-Compliance “X” and the Legal Reference narrative as per ILO-Better Work provided Law Guidance information. For Step 1 questions *with Law Guidance*, the Verifier no longer has to determine whether a specific facility circumstance is not in compliance with applicable legal requirements. The system will automatically do it for them. This feature increases report quality through standard application of non-compliances and legal references.

~~Remember, Law Guidance is not included for all countries and all questions. There may also be non-compliances to applicable laws in Step 1 that are not included in the Law Overlay. It is still the Verifier’s responsibility to ensure all non-compliances with applicable legal requirements are identified in the verified assessment report.~~

! Remember, Law Guidance is not included for all countries and all questions. There may also be non-compliances to applicable laws in Step 1 that are not included in the Law Overlay. It is still the Verifier’s responsibility to ensure all non-compliances with applicable legal requirements are identified in the verified assessment report.

The Verifier can override the automatic completion on Non-Compliance and Legal Reference, though it is highly unlikely that the Verifier will need to do so. If the Verifier overrides the automatic completion, this special circumstance (that would usually result in a non-compliance but in this special facility case does not) must be explained in Verification Data.

See also our [Helpdesk for more information](#).

2.8. Quality Assurance

2.8.1. VOO Quality Assurance Procedures for Accepted Verified Assessments

The VOO can choose to conduct any type of quality assurance procedures for any verified assessment. More information about these procedures is in the [SLCP Quality Assurance Manual](#).

Timelines:

- Reports for Desktop Review are selected within 10 working days of an assessment changing to VRF.
- The VOO completes Desktop Review within another 10 working days.

- Sites for Counter and Duplicate Verifications are usually selected within 2-4 weeks of the verification date and the process of scheduling, conducting the Counter Verification and completing the QA report could take up to 6 weeks.

QA activity by the VOO can result in invalidation of the verified assessment report, which means that the report can no longer be shared with end users and the full report is no longer available on the Accredited Host site or Gateway. The only information that will be available is that the facility has an invalidated report along with the reason the report was invalidated.

2.8.2. Post VRF Edits

There may be exceptional circumstances where mistakes are not identified during the VB internal quality review or via VOO QA. In these cases, the VOO notifies the Verifier Body, Verifier(s) and Accredited Host (AH) of the situation and will temporarily change the status to VRE. The change may be made directly by the VOO in coordination with the AH or the Verifier will be instructed to make the change. The Verifier will the need to work with the VOO to determine the edits that need to be made. See the SLCP QA Manual for further details.

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2.8.23. Verifier Feedback

The VOO provides VBs with feedback in any instances where a QA activity shows a Verifier has “less than average” performance. While there is no report detailing the specifics, the feedback should be enough for the VB to address any gaps and improve the Verifier's performance.

- **Example:** Recent reports received a low-quality score because the Verifier(s) did not properly address questions that were not answered by the facility. did not answer. If a facility does not respond to a question, it is the Verifier's responsibility to answer the question by choosing a “Corrected Response”. The Verification Data entered must support the Verifier's Corrected Response by describing the types of evidence they reviewed.

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The scope of the VOO

The purpose of the VOO is to ensure quality of the SLCP verification process and the verified data resulting from that process. Quality means the verification process is consistent and verification data is reliable. The VOO uses a variety of QA methods to detect issues with the verification process and identify data reliability issues. QA outcomes are used to determine how to improve the SLCP system. QA is a dynamic process – activities vary based on actual operations and QA learnings inform the ongoing QA approach.

It is not the VOO's role to ensure each and every verified assessment report is free of errors. As the owner of the report, the facility has the opportunity and responsibility to review the verified assessment report and inform the Verifier/ VB and/or VOO of any quality deficiencies. Rather, through targeted QA activities, the VOO can detect overall quality issues with the verification process or report outcomes and address these deficiencies with targeted interventions and system improvements.

If a user of the verified assessment report would like to better understand how a Verifier approached a specific topic, or to inquire about further verification details (on top of already sufficient and good quality data), the user needs to reach out to the facility, or ask the facility to facilitate contact with the applicable VB for further information. The facility owns the data and thus provides the permission to access that data, especially if the data goes beyond what is already contained in the verified assessment report.

If a user wants to share information about the quality of a specific verified assessment report, they can provide their feedback through the [feedback form](#) or if they have questions about the report which cannot be answered by the facility or the VB (with permission by the facility) they can contact the [support desk](#).

facility) they can contact the [support desk](#).

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SLCP Verification Requirements

3. SLCP Verification Requirements

These requirements are mandatory for Verifier Bodies and Verifiers. Guidance is provided for each requirement along with examples of potential scenarios/situations and how to handle them. ~~The guidance is a critical component of the requirements and therefore should be read.~~ Some requirements are also accompanied with recommendations and/or references to provide further support throughout the verification process.

! The guidance is a critical component of the requirements and must be read.

3.0. General ~~Requirement~~Requirements

If the Verifier/ Verifier Body cannot adhere to the requirements listed in this Protocol (all requirements including Section 3. ~~and~~And Section 5.) the Verifier/ Verifier Body must submit an [Exception Request](#) to the Verification Oversight Organization.

3.1. Pre-onsite Verification

3.1.1. Requirements for Planning the Verification

Requirements	Guidance	Recommendations
<p>3.1.1.1. Onsite portion of the Verification must happenbe started within <u>two (2) months of completion of the self/joint-assessment completion date</u></p>	<ul style="list-style-type: none"> The date the Verifier must reference to determine completion of the self/joint-assessment is in the Data Collection Tool, Facility Profile question FP-BAS-26 Date of self/ or joint-assessment submission (YYYY-MM-DD). Should the facility/VB miss this timeframe for <u>onsite</u> verification, the facility must contact SLCP through the Helpdesk to change the status of the assessment back to ASI-Assessment Initiated so the facility can update the self/joint-assessment and question FP-BAS-26. 	<p>SLCP recommends scheduling the <u>onsite</u> verification at a time where at least 80% of the workforce is active, i.e. <u>to</u> avoid scheduling the verification during very low volume or holiday seasons.</p>
<p>3.1.1.2. VB must confirm if any major changes to the workforce are permanent (e.g. <u>to</u> terminations) or temporary (e.g. <u>to</u> furloughs) so as to determine onsite <u>to</u> time needed for verification</p>	<p>If changes in workforce are temporary, then furloughed workers must also be considered when determining the amount of onsite time.</p> <ul style="list-style-type: none"> Onsite time is based on the facility's current workforce (workforce at the time of onsite verification). Changes to the 	

	<p>workforce due to COVID-19 may impact the amount of time VBs spend on site.</p> <ul style="list-style-type: none"> • The Verifier confirms major changes to the workforce during scheduling and also when onsite if prior information was not available. Note: <u>The Verifier must confirm major changes to the workforce during scheduling in order to be able to accommodate for any changes in person days. Any major changes to the workforce should also be confirmed when the Verifier is onsite if prior information was not available; however, if changes to the workforce are substantial enough to impact person days the Verifier must be aware of this prior to going onsite.</u> <p><u>If at time of arrival at the facility the scope of the verification changes due to changes in facility circumstances, and the scope change means an increase in person days, then the Verifier needs to immediately alert the VOO.</u></p> <p><u>If the Verifier/VB cannot extend the onsite time, then they proceed as per scheduled, but the Verifier must make explicit note in the Verification Details how they deviated from the Verification Protocol. For example: the number of facility workers increased significantly just prior to onsite verification but the VB was not able to extend the number of person Days at such short notice. The number of worker interviews were increased to reflect a sample size of xx while still permitting onsite verification to be conducted within the originally scheduled person days. Offsite document review also involved an increase in sample size of xx for personnel files.</u></p>	
<p>3.1.1.3. The facility must determine the type of announcement.</p>	<ul style="list-style-type: none"> • Verification must be announced or semi-announced within a 10-day window. <ul style="list-style-type: none"> – If the facility wants to speed the process up and start verification earlier than 10 days, this is at the discretion of the Verifier/ VB, and the Verifier/ VB can shorten the 	

	<p>timeframe for self/joint-assessment review. But the Verifier must still adhere to Protocol requirements, i.e., review self/joint-assessment, submit verification plan, etc. Since some mandatory timeframe requirements may not be adhered to (e.g. verification plan submission no less than 5 working days prior to verification) the VB/ Verifier must file an Exception Request whenever a Protocol requirement is not adhered to.</p> <ul style="list-style-type: none"> • Should the facility wish to have an unannounced verification, this is also possible, but SLCP does not require the verification to be unannounced. • In planning, the VB must consider local/national holidays as well as any specific dates or date ranges that the facility will be unavailable for verification. 	
<p>3.1.1.4. The facility and the VB must agree on and have a documented agreement outlining the specified date or date range for onsite verification</p>	<ul style="list-style-type: none"> • The onsite verification must take place over consecutive days. The Verifier cannot start the onsite verification and then stop for a day or two before continuing. Once the verification begins, it must continue each following day until complete. • The documented agreement between facility and VB must be agreed and signed prior to verification taking place. 	
<p>3.1.1.5. If the VB is asked by another organization to shadow or observe the upcoming verification, the VB and Verifier must follow the Verification Observation Requirements</p>	<ul style="list-style-type: none"> • To facilitate communications and expectations around verification observations/ shadowing by parties other than the VOO, SLCP has created a process that must be followed. 	<p>Please refer to the Verification Observation Requirements on our Helpdesk.</p>

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3.1.2. Requirements for Assigning a Verifier

Requirements	Guidance	Recommendations / References
3.1.2.1. The VB must ensure all rules for Verifier selection are enforced	The Gateway provides some filtering to ensure some rules are enforced for Verifier selection but ultimately the responsibility lies with the VB. VBs can also access the Helpdesk FAQs to obtain more instructions on how to use the Gateway.	
3.1.2.2. The VB must follow verification person-day minimum requirements and must assign more than one Verifier accordingly	See Table 2 for person-day minimum requirements for onsite verification without any virtual/ desktop verification activity.	
3.1.2.3. The VB must comply with the rules of eligibility	<ul style="list-style-type: none"> • Verifiers are only eligible for a specific verification if: <ul style="list-style-type: none"> – The Verifier did not verify the facility’s previous assessment (this rule applies even if a facility has moved locations) – The VB is not involved in the self/joint-assessment that is now undergoing verification • Verifiers must meet these requirements: <ul style="list-style-type: none"> – Must not have verified the facility’s last self/joint-assessment – Must not have had any involvement with current self/joint-assessment – One Verifier (if team) must be eligible to verify in the country where the facility is located – One Verifier (if team) must speak at least one of the worker languages • Refer to Annex II for more information on how VBs and Verifiers are designated eligible for a specific facility. 	<p>SLCP recommends that:</p> <ul style="list-style-type: none"> • Verifier gender is appropriate for the facility circumstances • Verifier gender is different from previous assessment, if such switch in gender will facilitate gathering of different perspectives during the present verification • Additional Verifiers are eligible to verify in the country of verification according to VOO qualification • Any additional Verifiers speak at least one of the worker languages.

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3.1.3. Requirements for Assigning Person-days

Requirements	Guidance
<p>3.1.3.1. The number of calendar days for onsite verification must not exceed 4 consecutive working days</p>	<ul style="list-style-type: none"> • The 4 consecutive working day maximum allowance for onsite verification can only be exceeded if the facility provides written permission. • If the number of calendar days exceeds 4 consecutive working days, the VB must send more than one Verifier.
<p>3.1.3.2. Trainees, assistants or other individuals who are not SLCP approved Verifiers cannot count toward the person-day requirement</p>	<ul style="list-style-type: none"> • A person-day means one SLCP approved Verifier is present onsite at the facility for one 8 hour working day. • A half person-day means one SLCP approved Verifier is present onsite for 4 hours during a calendar day.
<p>3.1.3.3. Person-day requirements may only be decreased if virtual verification activity takes place and in accordance with virtual verification requirements</p>	<ul style="list-style-type: none"> • For information on possible reduction in person-days see 5.1.4. Requirements • Step 1 person-day listing in Table 2 is a minimum requirement for onsite verification and must be followed. • <u>If the facility chooses more than Step 1 (i.e., Step 2 or Step 3), person-day requirements must be at least half a person-day more than the indicated Step 1 minimum. For example, if the facility has 1-100 workers, Step 1 minimum is 1 person-day, Step 2 minimum is 1.5 person-days, Step 3 minimum is also 1.5 person-days.</u> • <u>Calculation of person-days are in minimum 0.5 person-day increments. This means a Verifier has to be assigned a minimum 0.5 days for a verification and the VB has to meet the minimum total person-day requirement.</u>

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3.1.4. Requirements for Calculating Number of Person-days, Interviews and Documents to Review

Requirements	Guidance	Recommendations / References
<p>3.1.4.1. VB and Verifiers must follow Table 2 (below) in calculating on-site person days, number of interviews and the sample of documents to review for onsite verification</p>	<p>Table 2:</p> <ul style="list-style-type: none"> • Workers in this context means the workers who are within scope of the SLCP assessment. These are workers (individuals working on/with the facility's facility's product or directly involved in the operations of the facility). They are non-supervisory. Which means, no one reports to them. • Time estimate estimates for interviews: 15 minutes per individual interview, 30 minutes per group of 4-6. Group interviews are in addition to individual interviews. E.g., 1-100 workers total 12-14 workers must be interviewed. • Exceptions to the person day-requirements or other requirements in the Verification Protocol may be made by the VOO. Exceptions can be requested by completing an Exception Request form. 	<ul style="list-style-type: none"> • Step 2 and Step 3 person-day listings in Table 2 are suggested timeframes as the scope of verification can drastically differ from one facility to another in the sections of Management Systems and Above and Beyond • SLCP recommends that the VB adds additional onsite time if any of the following conditions apply: <ul style="list-style-type: none"> – Facilities have migrant workers and/ or languages need to be supported to conduct interviews – Facilities have specialized operations with additional health and safety hazards, such as vehicle fleets, water reservoirs or large quantities of hazardous material – Facilities have large compounds, or more than one location associated with the business license.
<p>3.1.4.2. If more than one Verifier is present and Verifiers were not present each day, Verifier must note in Verification Details the name of Verifier present on which day</p>	<ul style="list-style-type: none"> • Not all Verifiers need to be present every day of the onsite verification, however details about who was present on which day needs to be entered in the Verification Details section of the report 	

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Table 2: Determining minimum person-days, number of interviews and sample of document review

Number of Workers	Individual Worker Interviews	Number of Group Worker Interviews	Personnel Files	Wage & Hours Records	Minimum requirement	Any step In addition to step 1 requires a minimum 0.5 person-day more time than the “Minimum requirement”. Below are suggested total person days.	
					Person-Days (Step 1)	Person-Days (Step 2)	Person-Days (Step 3)
1 – 100	8	1	12-14^	10 x set of 3 = 30	1	1.5	2
101-200	12	2	20-24^	20 x set of 3 = 60	1.5	2	2.5
201 – 500	15	3	27-33^	27 x set of 3 = 81	2	2.5	3
501 – 1000	20	4	36-44^	40 x set of 3 = 120	3	3.5	4
1001+	28	6	52-64^	55 x set of 3 = 165	4	4.5**	5**

^ Range applicable, as group interviews are one group of 4-6 workers.

** VBs must send at least two Verifiers onsite to limit the calendar days onsite (unless facility provides express permission to exceed the 4 calendar day requirement and the Verifier receives approval from the VOO via the [Exception Request Form](#)).

Note: Person days can be reduced in increments of 0.5 person-days if virtual activity is conducted, see [Table 4](#)

Report writing time and other activities around the actual verification event are not included in the person-days (e.g., self/joint-assessment review, verification plan completion, background research, etc.).

Important: If going above Step 1, the minimum for Step 2 AND 3 is 0.5 day more. That means Step 2 suggested person-days are the minimum for both Step 2 and 3. [Return to the top.](#)

Increasing the number of person-days needed for verification

SLCP does not prevent the Verifier from increasing the number of person-days from the minimum requirement shown in Table 2. If the VB knows that the minimum requirement is not enough to be able to complete all Protocol required tasks, then the VB should add more days. This can be done from the beginning (at scheduling) or also if the Verifier is encountering difficulties during the onsite.

If the VB/ Verifier needs more time for verification, it should be discussed with the facility. The Verifier should explain to the facility that it is in the facility's best interest for the Verifier to have ALL the facts to ensure accuracy of the verified assessment report. Moreover, the verified assessment report can always include the facility's perspective and response to a specific situation. Consequently, gathering all this additional info may take more time.

Note: The maximum number of calendar days permitted for onsite verification is 4 days. If the VB finds that more time is needed, then more Verifiers can be added to the verification to ensure verification remains within the 4-day limit or the VB/ Verifier can file an Exception Request.

Worker interviews

Verifiers can always interview more personnel and other personnel other than "workers"; however, this is not part of the minimum requirement for interviews. For example, persons in a supervisory function or in a service role (e.g. canteen, cleaner) are not considered "workers" and do not count toward the number of required "worker" interviews.

Example: If the Verifier is conducting interviews in a facility of 50 workers, Table 2 indicates that there must be 8 individual worker interviews. If the Verifier decides to interview a team leader, the Verifier may do so, but then the Verifier would be conducting 9 interviews in total (8 worker interviews and one supervisor interview).

Box 2: Increasing the number of person-days needed for verification

SLCP does not prevent the Verifier from increasing the number of person-days from the minimum requirement shown in Table 2. If the VB knows that the minimum requirement is not enough to be able to complete all Protocol required tasks, then the VB should add more days. This can be done from the beginning (at scheduling) or also if the Verifier is encountering difficulties during the onsite.

If the VB/ Verifier needs more time for verification, it should be discussed with the facility. The Verifier should explain to the facility that it is in the facility's best interest for the Verifier to have ALL the facts to ensure accuracy of the verified assessment report. Moreover, the verified assessment report can always include the facility's perspective and response to a specific situation. Consequently, gathering all this additional info may take more time.

Note: The maximum number of calendar days permitted for onsite verification is 4 days. If the VB finds that more time is needed, then more Verifiers can be added to the verification to ensure verification remains within the 4-day limit or the VB/ Verifier can file an Exception Request.

Worker interviews

Verifiers can always interview more personnel and other personnel other than "workers"; however, this is not part of the minimum requirement for interviews. For example, persons in a supervisory function or in a service role (e.g., canteen, cleaner) are not considered "workers" and do not count toward the number of required "worker" interviews.

Example: If the Verifier is conducting interviews in a facility of 50 workers, Table 2 indicates that there must be 8 individual worker interviews. If the Verifier decides to interview a team leader, the Verifier may do so, but then the Verifier would be conducting 9 interviews in total (8 worker interviews and one supervisor interview).

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3.1.5. Requirements for Review of Self/Joint Assessment

Requirements	Guidance
<p>3.1.5.1. The Verifier must study the self/joint-assessment completed by the facility to prepare for the onsite verification</p>	<ul style="list-style-type: none"> • Preparation will also help with creation of the facility-specific verification plan, see Requirement 3.1.6.2 • The Verifier will gain an understanding of the facility’s management systems (e.g., management personnel onsite, scope of documentation, physical premises of the facility), as well as potential risk areas (e.g., migrant labor, dormitories and hazardous operations).
<p>3.1.5.2. Verifier must ensure the Steps (1, 2 or 3) the facility has included in the self/joint-assessment match the verification scope negotiated between the VB and the facility</p>	<ul style="list-style-type: none"> • Based on the preliminary offline conversations between the facility and the VB regarding quotes and services, the VB needs to ensure that the scope agreed upon (Step 1, 2 or 3) is what has been completed in the self/joint-assessment. • If there is any discrepancy, the Verifier must reach out to the facility to discuss any adjustments needed either to the self/joint-assessment or to cost/timeline of verification.
<p>3.1.5.3. Verifier must ensure the self/joint-assessment contains at minimum 3 months of operation/3 months of self-assessed data</p>	<ul style="list-style-type: none"> • Verification can only take place if the facility has provided at a minimum 3 months of operation/3 months of self-assessed data. • This must be verified prior to the verification process beginning.
<p>3.1.5.4. Verifier must review self/joint-assessment answers to ensure only English was used for facility responses (unless the question explicitly asks for local language)</p>	<ul style="list-style-type: none"> • It is in the VB’s/Verifier’s interest to ensure all facility responses are in English, because if the facility’s responses are not in English, the Verifier will have to provide the English response in Verification Data for users to understand the final verified response. This means the Verifier is spending time translating the facility responses. • Accredited Host checks are required to detect non-English language and direct the facility to update the response to English. However, technical failures can occur. If the self/joint-assessment contains non-English responses, the Verifier should direct the facility to reopen the assessment (change back to ASI – Assessment Initiated by contacting the SLCP Helpdesk) and update the responses. <p>•—There are only two questions that ask for local language responses, if applicable.</p> <p>•</p>

<p>3.1.5.5. VB and Verifier must obtain relevant social and labor information related to specific conditions within the country and region of SLCP verifications</p>	<ul style="list-style-type: none">• Employment laws include minimum wage, working hours and social benefits that pertain to the facility location• International Labour Organization (ILO) conventions pertaining specifically to the eight ILO Fundamental Conventions:<ul style="list-style-type: none">– Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)– Right to Organise and Collective Bargaining Convention, 1949 (No. 98)– Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)– Abolition of Forced Labour Convention, 1957 (No. 105)– Minimum Age Convention, 1973 (No. 138)– Worst Forms of Child Labour Convention, 1999 (No. 182)– Equal Remuneration Convention, 1951 (No. 100)– Discrimination (Employment and Occupation) Convention, 1958 (No. 111)• Further resources provided by the ILO for labor law are: Industrial Relations Database and Working Conditions Laws Database.
<p>3.1.5.6. The VB must conduct a background check of the facility</p>	<ul style="list-style-type: none">• The background check must include at a minimum:<ul style="list-style-type: none">– Web-based research on the facility and its local area for any social and labor issues or labor unrest that may have occurred in the last two years (potential sources of information are trade unions, regulatory bodies, community members, non-governmental organizations and government websites that provide information on present or past legal action)– Worker demographics (e.g., migrant workers, young workers as well as any possible language challenges)– The type of laws that apply to the particular facility• The Verifier may also request previous social audit reports or the previous SLCP verified assessment report to obtain facility-specific information; however, the facility is not obligated to share this information with Verifiers• The Verifier should be aware of potential bias that can develop with review of previous reports.

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3.1.6. Requirements for Pre-verification Communication to Facility

Requirements	Guidance	Recommendations / References
<p>3.1.6.1 Verifier/VB must communicate specific verification information to the facility no later than 10 working days prior to the date of the start of verification activity (onsite or virtual activity)</p>	<ul style="list-style-type: none"> • Verification information must include: <ul style="list-style-type: none"> – The number of person-days and calendar days required to complete the verification – Reminder of how the facility must include information on COVID-19 in the self/joint-assessment (use Annex III) – Document list – customized based on country of verification (a non-customized, <u>basic</u> document list is provided in Annex V to help initiate the process) – The expectation that onsite verification requires access to all areas of the facility and its grounds, photographs (respecting and avoiding proprietary information) and confidential interviews between the Verifier and workers and management – A statement on the need for senior management and workers’ representatives to be present at the opening and closing meeting – Contact details for Verifiers/VB in case facility needs a local contact (telephone number and email) – An explanation that only under exceptional circumstances (e.g., non-access to documentation or information due to absence of key management personnel on the days of the verification assessment), the facility may provide additional information after the 	<p>SLCP has created a template (see Annex IV) that can be used to communicate the verification information</p> <p>More information about SLCP and its process: https://slconvergence.org/helpdesk https://slconvergence.org/helpdesk</p> <p>The SLCP Code of Conduct (see Annex VI)</p> <p>SLCP QA Manual, which explains the Dispute Process and how reports may be invalidated: https://slcp.zendesk.com/hc/en-us/articles/360014823394-Quality-Assurance-Manual https://slcp.zendesk.com/hc/en-us/articles/360014823394-Quality-Assurance-Manual</p>

	<p>onsite verification. Normal Protocol requires the facility to have all information ready during onsite verification. Delay of closing the verification process can last only up to 2 working days, i.e., the facility can only provide additional information up to 2 working days after the onsite verification. This gives the Verifier 8 working days to complete the verified assessment report. Additional fees may apply depending on the scope of work to be completed post verification.</p> <ul style="list-style-type: none"> • Prior to VB selection, the VB does not have access to the self/joint-assessment data. When providing quotes to the facility at that time, the VB will request facility data, such as, location, number of workers and languages spoken to estimate the onsite verification duration. The verification duration can only be <i>estimated</i> until the VB has access to the self/joint-assessment data. Once the self/joint-assessment is shared, the VB can properly assess verification requirements and include them in the verification information required 10 working days before verification starts. 	
<p>3.1.6.2 The Verifier/VB must send a verification plan no less than five working days prior to the scheduled verification</p>	<p>The verification plan must outline the daily verification details including, at a minimum:</p> <ul style="list-style-type: none"> – The specific calendar days onsite (or number of days if verification is semi-announced) – The hours of verification (start and finish for each day) – The expectations for the opening meeting, including who should be in attendance (Verifier can infer information about management, workers, workers’ representatives/ union representatives from the self/joint-assessment) 	<p>See the Verifier Guidance for a verification plan sample.</p>

	<ul style="list-style-type: none"> -The minimum number of interviews that have to be conducted -The minimum number of wage/hour/personnel records that have to be reviewed -The document request list (even if virtual/desktop review of documents occurred and/ or if the facility attached the documents to the self/joint-assessment). 	
<p>3.1.6.3 During the scheduling process, the VB must discuss with the facility any changes in their workforce due to COVID-19 or other exceptional circumstances</p>	<ul style="list-style-type: none"> • If the facility has experienced a change of 50% or more of their workforce since the date of completion of their self/joint-assessment, the VB must advise the facility to review and update the self-assessment. Note: that if the workforce has changed considerably, there may be multiple questions that need to be updated by the facility, not just worker demographic information • <u>Should the difference between the Facility Profile self/joint-assessment and actual circumstances during verification affect the person-day and/or other requirements, the Verifier must follow all Verification Protocol requirements applicable to the current facility circumstances.</u> 	<ul style="list-style-type: none"> • Closer to the verification, VBs should ensure that the processes the facility self-reported on will be in operation during the verification (e.g. if certain parts of what the facility does are not operational, the verification should not take place) • Prior to travelling to the verification site, VB should check for any health and safety or travel restrictions put in place by local governments. Additionally, VB and Verifiers should abide by any health and safety policies factories implement or any applicable laws/ regulations in place, whichever stricter, to protect workers and visitors (e.g. wearing a mask, temperature checks)

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3.2. Onsite Verification

3.2.1. General Onsite Verification Requirements

Requirements	Guidance	Recommendations / References
<p>3.2.1.1. Verifier must verify all data</p>	<p>“All data” means all questions that are applicable to the facility according to the Step chosen in the self/joint-assessment:</p> <ul style="list-style-type: none"> – Recruitment and Hiring (Step 1) – Working Hours (Step 1) – Wages and Benefits (Step 1) – Worker Treatment (Step 1) – Worker Involvement (Step 1) – Health and Safety (Step 1) – Termination (Step 1) – Management Systems (Step 2) – Above and Beyond (Step 3) <ul style="list-style-type: none"> • Even if the facility did not provide an answer to the applicable question, the Verifier has to verify what the correct answer is • Some Verifier selections in the Tool can open up questions that the facility did not see during the self/joint-assessment and therefore did not answer. The Verifier must provide the correct verification information to these unanswered questions. New to v1.4.2 is the automation of some Verifier selections, including “Not visible to facility during SA/JA”. This selection will now automatically be made for the Verifier when a Verifier’s corrected response unhides previously hidden conditionalities that had not been visible to the facility when providing the incorrect response; however, the Verifier must still provide the Corrected Response and supporting Verification Data to these unanswered questions. <p><u>See Requirement 3.3.3.1 under Section “3.3.3 Requirements for</u></p>	<p>See Verifier Guidance for more details</p>

<p>3.2.1.2. The timeframe of the verification data must be based on the same previous 12 months from the date that the self/joint-assessment is completed by the facility</p>	<p><u>Report Writing” for more information on automated Verifier response option selections.</u></p> <ul style="list-style-type: none"> • This timeframe is referred to as the assessment period. • The only exception to this is when filling in the Facility Profile. When the Verifier arrives onsite the Facility Profile circumstances may be different from what they were during the self/joint-assessment. For Facility Profile information, the Verifier must include the most up-to-date/current information as of the date of the onsite verification, which may require an update and selection of “Updated during Verification”. These changes are not considered “Inaccuracies” but rather updates to the provided facility data. • For all other questions, the assessment period includes the 12 months prior to the submission date of the self/joint-assessment (FP-BAS-26 Date of self/ or joint-assessment submission (YYYY-MM-DD)). • <u>Should the difference between the Facility Profile self/joint-assessment and actual circumstances during verification affect the person-day and/or other requirements, the Verifier must follow all Verification Protocol requirements applicable to the current facility circumstances.</u> • <u>Note: The Verifier must confirm major changes to the workforce during scheduling in order to be able to accommodate for any changes in person days. Any major changes to the workforce should also be confirmed when the Verifier is onsite if prior information was not available; however, if changes to the workforce are substantial enough to impact person days the Verifier must be aware of this prior to going onsite.</u> <p><u>If at time of arrival at the facility the scope of the verification changes due to changes in facility circumstances, and the scope change means an increase in person days, then the Verifier needs to immediately alert the VOO.</u></p>	
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	<p><u>If the Verifier/VB cannot extend the onsite time, then they proceed as per scheduled, but the Verifier must make explicit note in the Verification Details how they deviated from the Verification Protocol. For example: the number of facility workers increased significantly just prior to onsite verification but the VB was not able to extend the number of person days at such short notice. The number of worker interviews were increased to reflect a sample size of xx while still permitting onsite verification to be conducted within the originally scheduled person days. Offsite document review also involved an increase in sample size for personnel files.</u></p> <ul style="list-style-type: none"> <u>Note: Although the date of onsite verification does not technically exist within the 12-month scope of the self-assessment, any onsite observations must be used to verify facility responses. For example, the facility responds that within the past 12 months there has been no obstruction to fire exits but when the Verifier conducts the onsite verification there are boxes and other materials that have been placed in front of a fire exit door. The Verifier must then mark the facility response as inaccurate and provide details in Verification Data. Any observation the Verifier makes on site to contradict a facility response suggests that it is not an isolated practice and must be included as part of the 12-month assessment.</u> 	
<p>3.2.1.3. Each verification must cover the area as defined by the facility in the Facility Profile of the self/joint-assessment and all operations</p>	<ul style="list-style-type: none"> The physical scope reported is tied to the facility’s business license and operations permitted therein. Should the actual physical scope greatly differ from the self-assessed/ facility-reported physical scope and the Verifier decides the scheduled verification timeframe is not enough to complete a verification of the actual physical scope, the Verifier may extend the verification person-days or reschedule the verification. <u>Dependent upon country, Business License requirements can vary. As an example, one license may cover multiple addresses, or a facility may have multiple operations with one address under separate licenses.</u> 	<p>Please reference a detailed table on our Helpdesk for facilities, Verifier/ VB and users of the verified assessment to understand the relationship between Facility Profile, assessment and verification.</p>

<p>included therein</p>	<ul style="list-style-type: none"> • <u>If the facility has multiple business licenses but only one address, the Verifier need only conduct one verification as it is still considered to be only one facility as per the facility profile created on the Gateway. Question about business license information in the Tool (key fp-bi-1) will have multiple entries when the facility opts in for one assessment only. The facility must provide the multiple business license names as the response. The facility must treat the multiple business licenses as one facility, meaning the number of workers shall be all business licenses combined.</u> • <u>For additional guidance and clear requirements on assessments related to a facility’s business licence in all countries where SLCP is operational, see https://slcp.zendesk.com/hc/en-us/articles/360012552213-What-are-the-rules-around-creating-facility-profiles-on-the-Gateway-</u> • <u>Note: Only housing used by workers (does not have to be exclusively used by them) is within scope of verification and must be part of the health and safety walkthrough by the Verifier. If housing is onsite at facility premises and not used by any workers, then at minimum, the Verifier shall answer the documentation-based question: “Are building/construction, structural safety and fire permits and certificates for housing/dormitories in line with legal requirements?” to provide the report user some information about the legality of the onsite housing arrangement.</u> 	
<p>3.2.1.4. Any verification activity must be in compliance with <u>anyall</u> applicable data privacy</p>	<ul style="list-style-type: none"> • This applies to all data including: <ul style="list-style-type: none"> – Employee files and data for review and retention of such data/information – Narrative and attached photos/documents (photos must not contain employee names or any personally identifiable information for reasons of confidentiality and privacy). 	

<p>laws and regulations</p>		
<p>3.2.1.5. Verifiers must include all applicable types of “workers” in the verification</p>	<ul style="list-style-type: none"> • New hire, under probation, under age 18, union/ worker representative, pregnant, returning from maternity leave, foreign migrants, domestic migrants, other vulnerable groups or minorities • Part-time, fixed term, short-term (a person with a labor contract of limited or unspecified duration with no guarantee of continuation), temporary (e.g., labor supplied by a third-party employment agency). 	<p>In the event that Verifiers suspect potential issues among workers in the facility, Verifiers should also check third-party service providers not directly working <u>indirectly</u> on the product and therefore not included in the worker scope for the purposes of SLCP <u>purpose</u>. These workers are non-production workers. They may shed<u>show</u> more <u>light on</u>clearly the situation. Examples of such workers are those working in food service, security, childcare, and custodial.</p>
<p>3.2.1.6. Verifiers must cross-check information gained from observation and documentation review with information gathered from the interview process with both management and workers to understand how workers are affected by various situations</p>	<p>The general principle of “triangulation” applies to the verification activity just as it applies to traditional social auditing.</p> <p><u>All supporting documentation (e.g., photos, worker engagement survey, etc.) must also be used to cross check information provided in the self-assessment and to highlight any areas in need for further attention.</u></p>	

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3.2.2. Opening Meeting Onsite Verification Requirements

Requirements	Guidance	Agenda recommendations
<p>3.2.2.1 The onsite verification must start with an opening meeting</p>	<ul style="list-style-type: none"> • To the extent possible, the opening meeting includes facility management, workers' representatives, and those individuals responsible for managing recruitment, contracts, wages, and health and safety to discuss verification objectives, scope, and methodology. • Verifiers must encourage the facility to be open and transparent during the SLCP process. • <u>To avoid discussions of “did I pass” or “do I comply with brand Code of Conduct or XYZ standard”, Verifiers must remind the facility that SLCP is not a standard. SLCP only checks legal compliance along with accuracy of facility data.</u> 	<ul style="list-style-type: none"> • Introduction of the verification team and facility management personnel • Reviewing the scope and activities of verification • Reviewing a facility floor plan to ensure that all appropriate areas are part of the walk-through activity. Facility should advise whether Verifiers need PPE or a safety orientation to mitigate any health and safety risks
<p>3.2.2.2 Authorization to take pictures must be requested</p>	<ul style="list-style-type: none"> • Data integrity is key to the success of SLCP. Data collection and verification should reflect actual labor conditions. • The Verifier will observe facility restrictions and not photograph sensitive (i.e., proprietary) products, materials or processes. If photo authorization is completely denied, the Verifier will note the denial in the verified assessment report. Should the facility refuse the Verifier's request to take photos and yet agree to take photos themselves on behalf of the Verifier, this must be noted in the report along with any incidences where the Verifier did not receive pictures they requested. 	<ul style="list-style-type: none"> • Clarifying that the verification goal is to check that the assessment was completed correctly, to validate the accuracy of the data provided and to highlight any inaccurate data or circumstances of not following legal requirements • Data, including potentially confidential data, will be gathered during the verification. Data that can be linked back to a specific individual/ worker will be kept confidential and none will be shared outside the verification team with one exception: data can be made available to the SLCP VOO for quality review or investigation into the work of the Verifiers
<p>3.2.2.3 Verifier must inform management that the Verifier selects the workers to interview</p>	<ul style="list-style-type: none"> • The Verifier communicates to management that all worker interviews are confidential, and that the employer is prohibited from taking retaliatory action against those who are interviewed. 	

<p>3.2.2.4 If applicable, Verifiers must inform management that they wish to interview the head of the union(s) and worker representative(s)</p>	<ul style="list-style-type: none"> • The Verifier requests that each union put forward a group of worker level union members/ representatives. • If the facility management does not agree to the participation of workers and/or their representatives in interviews, the Verifier must cancel the verification as information cannot be verified. 	<ul style="list-style-type: none"> • Description of the report methodology and associated timelines for delivery of the verified assessment data, review of the verified assessment report, raising of concerns or questions to the VB/ Verifier, and raising of a formal Dispute.
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3.2.3. Walkthrough Onsite Verification Requirements

Requirements	Guidance
<p>3.2.3.1. Verifier must take time to first look at the ‘big picture’ before focusing in on the detail</p>	<p>Refer to Annex VII for tips on the onsite walkthrough.</p> <p>RecommendedExamples of items to look out for to understand the ‘big picture’:</p> <ul style="list-style-type: none"> • People being ushered out of the workplace (e.g. u children, or those without contracts) • People being moved within the workplace (e.g. u young people doing hazardous work or pregnant women working with chemicals being moved) • Things being hastily hidden (chemicals in the general work area u) or doors being quickly locked or unlocked • PPE being hastily put on • General demeanor of workers (are they willing to look up or do they avoid eye contact, are they allowed to talk to each other, go to the toilet when they wish).
<p>3.2.3.2 Verifier must inform the facility about any inaccuracies during the verification</p>	<p>Throughout the verification, the Verifier informs facility management about any inaccuracies, notable verification data entries and any non-compliances to applicable legal requirements. This will help the Verifier in conducting the closing meeting at the end of the verification, as any gaps or updates to the original facility response will not come as a surprise. In addition, the facility will likely have less questions and concerns about the Verifier Tool entries, as they will have already had the opportunity to discuss the items with the Verifier during the verification.</p>

<p>3.2.3.3 Verifier must follow any applicable facility H&S Health & Safety protocols</p>	<ul style="list-style-type: none"> • Facility should advise whether Verifiers need PPE or a safety orientation to mitigate any health and safety risks • Verifiers are expected to practice good hygiene and to respect any special facility H&S Health & Safety rules, e.g., social distancing when conducting verifications.
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3.2.4. Worker and Management Interview Onsite Verification Requirements

Worker Interview Requirements	Guidance
<p>3.2.4.1. Verifier must meet or exceed the minimum number of interviews</p>	<ul style="list-style-type: none"> • Sample size for onsite verifications without virtual verification activity is based on Table 2 • Verifier decides, based on real-time information at the facility, how to compose or expand the sample to achieve the best quality possible • The Verifier and not the facility selects the workers to interview. The Verifier may increase the number of interviewees as long as they are able to provide clear justification in the Verification Details section of the Tool as to why they did so.
<p>3.2.4.2. Verifier must interview a representative sample of workers</p>	<p>The Verifier must consider both the types of contracts and types of people in the workforce. See Annex VII for more information.</p>
<p>3.2.4.3. Verifier must interview the trade union and/or worker representative (if applicable to the facility)</p>	<ul style="list-style-type: none"> • This helps the Verifier explore their view of working conditions, management attitude as well as any specific issues. • If there are union/worker representatives serving in committees, they must also be included in the interviews. • SLCP recommends that the Verifier speak with a worker representative or equivalent – elected or not (this person could be a trade union representative or elected through an internal system or appointed by the facility) – or equivalent at the start of the Verification Process and also at the end of the process prior to the closing meeting. Where a Verifier suspects the union chairperson is influenced by management, they should also interview the other members of the trade union committee to determine the extent of management interference in the union, including

	<p>through tactics such as threats, transfers, or bribes. Verifiers should be very clear that the group meeting should not involve management/ office staff even if they are union members/ representatives.</p>
<p>3.2.4.4. Worker interviews are strictly confidential and subsequent reports will not identify the names of interviewees nor their individual responses</p>	<ul style="list-style-type: none"> • Verifiers must ensure that problems raised by workers are discussed with management in a way so as to not identify the worker who raised the problem. • Verifiers must never provide specific names, identification numbers or other obvious indicators of workers to facility management or within the assessment report (e.g., if there is only one worker in a specific section and that section is cited in the report). • Verifiers may keep a confidential record of those with whom they have had interviews if VB policy requires. • Interviews must take place away from management and supervisors in a room or space where interviewees feel comfortable sharing sensitive information.
<p>3.2.4.5. Interviews must take place in a language understood by workers either with additional Verifiers or onsite interpreters</p>	<ul style="list-style-type: none"> • This may involve the use of interpreters. SLCP is committed to the principle of being able to communicate with any person at the facility. This; however, this can be challenging at sites with multiple languages. • Information about languages is in the Facility Profile, but for scheduling purposes, the VB will have to inquire about the languages prior to receiving the self/joint-assessment. • <u>The Tool asks for primary, secondary and third most prevalent language spoken by workers, as well as the primary language spoken by facility management.</u> • <u>Note: When verifying how many languages supervisors and management must speak in order to communicate effectively with ALL workers in the facility, 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. Two examples are provided below:</u> <ul style="list-style-type: none"> • <u>Example 1: 90% of workers speak only Tamil, 10% of workers speak Hindi and Tamil. The answer is “1” language must be spoken by supervisors and management to effectively communicate with ALL workers since 100% of workers speak Tamil. In this case, supervisors and management need only speak Tamil to be able to effectively communicate with 100% of workers in the facility.</u> • <u>Example 2: 90% of workers speak only Tamil, 9% of workers speak Hindi and Tamil and 1% of workers speak only Hindi. The answer is “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. In this</u>

	<p><u>case supervisors and management must speak Tamil and Hindi to be able to effectively communicate with 100% of workers in the facility.</u></p>
<p>3.2.4.6. The verification team must be able to support at least the top two languages spoken by workers and the primary language spoken by management</p>	<ul style="list-style-type: none"> • The Tool asks for primary, secondary and third most prevalent language spoken by workers, as well as the primary language spoken by facility management. • If 100% of the facility (workers and management) speaks one language/ can comfortably communicate and answer interview questions in one language, then Verifier need only to speak this language. • Verifiers who are fluent in a language but cannot read/write are considered as being able to support a language. However, the VB must take care in selecting the Verifier(s) to ensure they can read the facility’s policies, procedures and other documentation relevant to completing the verification. • The facility has the right to insist on following a higher standard and requiring more language capability.
<p>3.2.4.7. Interpreters must be independent of the facility and trained to understand social compliance topics</p>	<ul style="list-style-type: none"> • It is recommended that Verifiers can support language requirements and interpreters should only be used in exceptional cases. Verifier eligibility is based, in part, on country presence so, in essence, interpreters should not be necessary. • If the Verifier(s) cannot support the language requirements, the VB may use professional translation/ interpreter services. Interpreters must be present on site. It is required to use interpreters who are trained to understand social compliance topics to allow for a thorough, accurate and trusted communication. • The Verifier/ VB should make clear in the verification plan the reason for using an interpreter • Finding and contracting an interpreter is the responsibility of the VB. In cases where interpreter cost or lack of qualified interpreters is an issue, the Verifier may appeal to the VOO for permission to provide less language capability for the verification.
<p>Management Interview Requirements</p>	<p>Guidance</p>
<p>3.2.4.8. Verifiers must conduct management interviews</p>	<ul style="list-style-type: none"> • Refer to Annex VII for tips on management interviews. • To support understanding of management systems and documents, Verifiers must engage in management interviews with applicable facility personnel, including, at minimum, personnel working in Human Resources, Industrial Relations, and Health & Safety.

- Questions in Step 2 related to “Management Systems” and in Step 3 related to “Above and Beyond” will require extensive engagement with management personnel, specifically those who engage in the aspects of Plan, Do Check, Act “PDCA” around management systems and those engaged in the management of worker well-being and community projects.

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3.2.5. Document Review Onsite Verification Requirements

General Document Review Requirements	Guidance
<p>3.2.5.1. Verifiers must review documents to understand the facility’s procedures and to verify specific claims about how the workforce is managed</p>	<ul style="list-style-type: none"> • The data collected during interviews must be checked against documentation to ensure that all information matches. The individuals interviewed will form part, but not necessarily all, of the sample of persons whose personnel files and payroll are verified. • However, SLCP recommends that if virtual wage/ hours records review took place, the subsequent onsite wage/ hours records review corresponds 100% to workers interviewed onsite. • The Verifier may decide onsite to concentrate a review of personnel files or payroll on a set of specific workers or on those persons with the highest/ lowest hours or wages per pay period. That decision is at the discretion of the Verifier. • Personnel files will be reviewed to verify facts about contracts, age and identity proof, training, job performance, disciplinary action and resignation/ termination. • <u>Policy documents must be carefully reviewed to ensure that all policies are covered. Some policy documents include reference to a number of different social and labor issues; however, this may not be overly apparent unless the document contents are reviewed. For example, an overarching Human Rights policy can include specific reference to a number of 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.</u> • <u>The Verifiers should be checking if policies exist and that policies follow local laws. Verifiers are not required to check if the policies follow any set standard or code since SLCP is not a standard. It is best practice, however, for Verifiers</u>

	<p><u>to include details on policies so end users can analyse the information in relation to their own codes.</u></p> <ul style="list-style-type: none"> Note: if virtual + onsite verification takes place: See Requirement 5.2.1.4. During onsite verification, Verifiers must ensure that policy documents shared virtually are physically available onsite
<p>Wage & Hours Records Requirements</p>	<p>Guidance</p>
<p>3.2.5.2. When reviewing wages and hours, Verifiers must select three pay periods (recent, high, low production period) from the 12-month assessment period to verify the self/joint-assessment data. If closure of production happened, the pay period during/ after closure must also be included.</p>	<ul style="list-style-type: none"> The three pay periods required for the sample are: <ol style="list-style-type: none"> The most recent pay period A peak pay period A low pay period <p>If there is no peak pay period (2.) or low pay period (3.) then the Verifier must select two other pay periods at random, but always include the most recent pay period.</p> The Verifier may extend the sample within the 12-month assessment period if s/he deems it necessary to substantiate the verification. <ul style="list-style-type: none"> Example 1: If a response is “Inaccurate” for working hours, the Verification Data will be based on the documents the Verifier sampled that showed the inaccuracy. There is no need to look for additional examples if the minimum scope of document review was completed. However, the Verifier can choose to sample more to better understand the extent of the problem. Example 2: <u>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, then the Verifier must extend the sample to validate the facility’s information. The Verifier not finding overtime, does not necessarily mean that the facility did not have any overtime and the facility response is Inaccurate. The Verifier must ask the facility to present the records showing overtime so the Verifier can accurately reflect the facility circumstances.</u> If the facility experienced any closures (e.g., due to COVID-19) the Verifier must include this time period in the record review to confirm that wages and benefits were paid in line with legal requirements. This means more than 3 sets of records may need to be reviewed (high, low, recent, closure).

3.2.5.3. When reviewing units for rate of pay, Verifier must include a breakdown of number of workers receiving each type of unit for rate of pay if the facility has more than one type of unit for rate of pay.

- The Verifier must include the overall percentage of workers who receive each type of unit for rate of pay if workers are paid in more than one type of unit for rate of pay
 - Example: if the facility has 100 workers but only 20 are paid by piece rate and the remaining workers are paid hourly then the Verifier must indicate this discrepancy by including in verification data: 20% of workers are paid by piece rate and 80% of workers are paid hourly. The user of the verified report can then better understand the most common type of wage payment in the facility.

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3.2.6. Document and Photo Attachment Onsite Verification Requirements

Requirement	Guidance
<p>3.2.6.1. Verifiers must include specific photographic evidence and/or documentation attached to questions of the Tool, selecting the question that best fits</p>	<ul style="list-style-type: none"> • At minimum, Verifiers must include photographic evidence and/or documentation in the following instances: <ul style="list-style-type: none"> – Outside general overview of the building and area surrounding the facility – Inside general overview – main section(s) of the interior, the “shop floor” – Attendance recording system – Work in progress: e.g. assembly, cutting, packing – Canteen, kitchen and/or dormitory (if present) – Waste handling and storage areas – Hazardous substance storage areas – Personal protective equipment – Firefighting equipment – Emergency exits and marked non-exits – Bulk storage tanks and secondary containment

- Supporting facilities such as wastewater treatment and boiler
- Abatement equipment (items used to reduce intensity of pollution)
- Good practices
- Issues identified as “Inaccurate” or “Non-Compliance” (when physical evidence and observable issues permit)
- Issues where more information would help the reader understand the facility circumstances, no matter the outcome of the “Verification Selection”
- **Photographs must only be taken with the permission of the facility** as they may contain confidential information, and all attachments should be free of personal/ private data. For example, if Verifiers want to demonstrate a wage issue, they may use a sample to highlight the issue and must black out any personal information.
- **Attachment of photos/ documentation is only possible through the online Accredited Host platform.**
 - Verifiers can attach a file at question level and thus select the most applicable question that relates to the attachment
 - Verifiers can also attach a file containing information of a more general nature or information that does not fit a specific question to the last question in the Verification Details section of the Tool: *Are there any photos you would like to add to the verification that did not directly correspond to a question?*
- If multiple photos are shared in one file/ attachment, SLCP recommends using a word processing software (e.g., Microsoft Word or equivalent) or a presentation software (e.g., Microsoft PowerPoint or equivalent) to capture the multiple photos and write a detailed description for each photo.
- Examples of instances for document/photo attachments are noted in the [Verifier Guidance](#).

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Situations of Denied Access

Should the Verifier experience any issues with viewing/accessing information required to verify the self-assessed data:

- Remind the facility of the CAF Terms of Use, which they agreed to when they set up their profile on the Gateway, specifically the clause: *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*
- Remind the facility of the purpose of SLCP (data collection and data sharing) and that it is in the facility's interest to have the most complete set of verified data for sharing
- Remind them that if the Verifier cannot verify the data, the Verification Selection will be "Inaccurate", affecting the Accuracy Index of the report.

If the facility still denies access, the Verifier must make note of denial in the Verification Details section of the report and in the Verification Data of the applicable question. If the Verifier cannot verify something, they must mark the answer as "Inaccurate" and state why it is inaccurate in Verification Data.

If denial of access is due to confidentiality, the Verifier must check the applicable confidentiality clause in place, include details about confidentiality in the Verification Data and also in the Verification Details section of the report.

In either circumstance, the Verifier must also include information on the facility's general behavior toward the assessment in Verification Details.

Box 3: Situations of Denied Access

Physical access denied to specific parts of the building or exclusion of entire buildings/ processes:

- 1) **NOT considered Denied Access:** If the facility makes note of a physical exclusion (part of the building attached to the business license (process, building, room, worker line)) from the self-assessment in the Facility Comments of the Facility Profile sections and the self-assessment does not include data to verify the excluded part, then the Verifier approaches the verification as usual, only verifying the scope of the facility as noted in the self-assessment. This is not considered Denied Access.
- 2) **Considered Denied Access:** If the facility does NOT make note of a physical exclusion (part of the building attached to the business license (process, building, room, worker line)) from the self-assessment in the Facility Comments of the Facility Profile sections; and the self-assessment DOES include data to verify the excluded part; but the facility does not permit access to the Verifier during verification. **In such a case, the Verifier must remind the facility:**
 - Of their agreement to abide to the CAF Terms of Use when they set up their profile on the Gateway, specifically the clause: *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*
 - Of the purpose of SLCP (data collection and data sharing). It is in the facility's interest to have the most complete set of verified data for sharing
 - That if the Verifier cannot verify the data, the Verification Selection will be "Inaccurate", affecting the Accuracy Index of the report.

If the facility still denies access, the Verifier must make note of denial in the Verification Details section of the report and in the Verification Data of the applicable question. If the Verifier cannot verify something, they must mark the answer as "Inaccurate" and state why it is inaccurate in Verification Data.

If denial of access is due to confidentiality, the Verifier must check the applicable confidentiality clause in place, include details about confidentiality in the Verification Data and also in the Verification Details section of the report. In either circumstance, the Verifier must also include information on the facility's general behavior toward the assessment in Verification Details.

Box 4: How to address situations of Denied Access

- Select “Inaccurate” to the facility response related to the physical area or process to which the Verifier is being denied
- In the Verification Data of the Inaccurate point:
 - address the rest of the facility they were able to assess and comment on those conditions (positive or negative)
 - make note of the denied access to each specific data point that is affected. The notation, if applicable, can be copy pasted in multiple Verification Data cells.
- Make note in the Verification Details:
 - of the denied access in detail with facility comments/ explanation
 - attach any policy/ procedure (upload on AH site) the facility must explain the denied access (e.g., if the denied access is due to confidentiality, intellectual property)
 - ask the facility if they have had another party assess social or EHS compliance of that specific area and attach the latest report to the Verification Details as attachment (upload on AH site)
- Verifier should strive to be able to answer as many questions as possible through other means if Access is Denied, e.g.:
 - If access is denied due to confidentiality, workers may be accessible for interview. If the facility included those workers in the denied access area in the facility self-assessment (the affected workers are in the facility worker count in the Facility Profile section), then the Verifier can ask workers questions about, for example, free access to potable water, toilets, and coming and going out of the restricted room.
 - Even though a specific area is denied access, the fire safety permit/ building permit, etc. would include that specific part of the facility. Verifier can make note of the permit as per the data point and note in Verification Data (even if Accurate) that the area of denied access is included in the permit.

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3.2.7. Pre-closing Meeting Onsite Verification Requirements

Requirements	Guidance
<p>3.2.7.1. Prior to the closing meeting, the Verifier must take the time to complete all “Inaccurate”, “Non-Compliance” (for Verification Summary) and “Updated during Verification” items to prepare for the closing meeting</p>	<ul style="list-style-type: none"> • If the Verifier has not already completed all “Inaccurate”, “Non-Compliance” and “Updated during Verification” items to create the Verification Summary in the Tool and prepare for the closing meeting, the Verifier must now take the time to complete as much as possible, and ideally all fields that will allow the Verifier to have a productive closing meeting with the help of the Verification Summary. • The “Updated during Verification” items do not appear in the Verification Summary, only in the Facility Profile filled in by the Verifier. But it is important to review these with the facility to ensure they are aware of the updated information. • Depending on the scope/ breadth of inaccuracies and non-compliances, the Verifier may not have enough time to complete all fields that are shown in the Verification Summary onsite and may have to skip some entries in the Verification Summary or just provide highlights to the facility. • More information about how to complete the Verification Summary is in the Verifier Guidance.
<p>3.2.7.2. The Verifier must have a final conversation with the union representative and/or worker representative interviewed at the beginning of the interview process, as applicable</p>	<p>This will help the Verifier gather any further information related to differences between the original self/joint-assessment data and the verified data.</p>

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3.2.8. Closing Meeting Onsite Verification Requirements

Requirements	Guidance	Agenda recommendations
<p>3.2.8.1. The onsite verification must end with a closing meeting</p>	<ul style="list-style-type: none"> The closing meeting should ideally include the same individuals who were present during the opening meeting, but at minimum facility management and union/ worker representatives, if applicable During the meeting, the Verifier reviews the scope of the work performed and highlights any discrepancies (gaps) between the self/joint-assessment and the verification outcomes so that a facility can understand how to better complete the Data Collection Tool the next time. <u>Verifiers must again remind the facility that SLCP is not a standard so as to avoid discussions of “did I pass” or “do I comply with brand Code of Conduct or XYZ standard”. SLCP only checks legal compliance.</u> 	<ul style="list-style-type: none"> Thanking facility management for their time Explanation of SLCP to the facility once more Explanation of where there were discrepancies between the self-assessed information and the Verifier data. This will be based on the Verification Summary (if Verifier had time to fully complete). Otherwise, conversation will focus on “Inaccurate” and “Non-Compliance” items
<p>3.2.8.2. Verifier must not provide training or help the facility to identify root causes of the issues found</p>	<ul style="list-style-type: none"> It is out of scope and not the Verifier’s role to train management, nor to help the facility identify the root causes of issues found or to help the facility develop a corrective action plan. The Verifier only explains the factual gaps between the assessment data and the verified data and reviews any instances (not already noted in the self/joint-assessment) where the facility is not following local legal requirements. 	<ul style="list-style-type: none"> Cooperation of staff and availability of information Confidentiality of the results Informing facility that the verified assessment data will be delivered within ten working days of the verification, calculated from the final day on site
<p>3.2.8.3. If applicable, Verifier must inform facility of any plans the VB/Verifier has to share the verified data with parties other than the Accredited Host and SLCP/ the VOO</p>	<ul style="list-style-type: none"> The information on data sharing by the VB can be shared with the facility during the scheduling process but must also be shared with the facility during the closing meeting. If the VB has an agreement with a user of the facility’s verified assessment report – other than the facility itself – and this agreement involves reporting of verified assessment data, the facility must be made aware of such 	<ul style="list-style-type: none"> Informing facility that there will be no Corrective Action Plans or improvement plans provided by the Verifier, as this is out of the scope of SLCP Mentioning two-day grace period (if applicable and exceptional circumstance)

	<p>reporting. For example, SLCP does not prohibit the VB from sending zero tolerance/ critical issue reports immediately after the onsite verification; but since these reports (which are outside of the SLCP system) include facility data obtained through the SLCP assessment process and the facility owns their data, the Verifier or VB must inform the facility of this special data sharing process.</p>	<p>is met see 3.3.1); facility can still provide more information to the Verifier to substantiate assessment information or clear up any issues with the Verifier that resulted from the onsite verification</p> <ul style="list-style-type: none"> • Dispute process
<p>3.2.8.4. Should the facility have any queries and/or concerns about the verified data at question level, the Verifier and facility must discuss and attempt to address the issues during the closing meeting</p>	<ul style="list-style-type: none"> • If not able to address the issues during the closing meeting, the VB/Verifier and facility must attempt to solve the issues within the two working days after closing of onsite verification (see Requirement 3.3.1.) • <u>If the issues still cannot be resolved, the facility still has time to connect with the VB/Verifier during the facility review process of the report (14 calendar days from receipt of verified assessment report), see Requirement 3.3.2. If concerns relate to Verifier following Verification Protocol and/or Verifier conduct, then the facility can raise a Dispute, see 2.5.7.</u> • <u>Note: There may be circumstances where the Verifier may feel intimidated by facility management, which could influence the results of the final verified assessment. It is important that the Verifier conveys to the facility that it is in the facility's best interest to have accurate information reported and that SLCP does not make judgements about the data collected. If the Verifier(s) is made to feel uncomfortable by the facility, the Verifier(s) can end the verification at any time and report the incident to the VOO.</u> 	<ul style="list-style-type: none"> • If applicable, VB/Verifier sharing of facility verified assessment data with users other than the facility.

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3.3. Post-onsite Verification

3.3.1. Requirements for Resolving Facility Concerns

Requirement	Guidance
<p>3.3.1.1. Verifier must address facility concerns brought up during the verification/closing meeting within two days (48 hours) from end of onsite verification and address any applicable requests for edits by the facility within the 14-calendar day review period in VRC</p>	<ul style="list-style-type: none"> • If concerns relate to question level issues like disagreement about a Non-Compliance, then the Verifier/VB must handle this offline with the facility. • If concerns relate to Verification Protocol or Verifier conduct, then the Verifier/VB must refer the facility to the Dispute process, see 2.5.7. • The Verifier may have to review further documentation or conduct remote interviews due to exceptional circumstances during onsite verification. Exceptional circumstances include management personnel being absent on day(s) of verification and Verifier requiring an interview with them or their presence is required to obtain access to specific policies/ procedures or explain policies/ procedures. • The facility may not have had any concerns during the closing meeting, but then brings up concerns about report content or quality in the 14-day review period. It is up to Verifier judgment to evaluate the validity of any evidence brought forward or edits raised by the facility. If the Verifier decides not to make edits, the Verifier should offer the facility to incorporate their concerns in the applicable Verification Data field along with an explanation from the Verifier why they did not make edits to the final report. • Example: If a facility explains to the Verifier during onsite assessment that they are unsure if they can share a document due to confidentiality, then the Verifier can use the 48 hours period after the onsite assessment to allow the facility to share more information with the Verifier. During the onsite, it should be evaluated that this document really exists and is something that is being implemented. <ul style="list-style-type: none"> • Note: The 48 hours is not for the facility to change the verification outcome by writing -up a document after onsite, nor is the 48 hours for the facility to make corrections to proven/ confirmed verification outcomes. • Important: Any legal non-compliance or inaccuracy determined at the time of the verification needs to be noted as a non-compliance and/or inaccuracy for the onsite verification. If the facility makes a correction before the end of the onsite verification, the Verifier can make a note in Verification Data that the facility already corrected/changed this data point, explain the outcome, and add a photo or another attachment; however, the Non-Compliance and/or Inaccuracy still remains. • Example: The facility can say all our fire extinguishers are mounted but perhaps on that specific day of verification

someone unmounted it and put it on the floor. Although it is a very easy fix it could be that workers are not trained to not touch the fire extinguishers; and, therefore, this needs to be reported. It is important to reflect what the Verifier saw/ determined before facility acted, as the inaccuracy/ non-compliance may be repeated in the future due to it being a systemic issue.

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3.3.2. Verified Assessment Report Revision Requirements

Requirements	Guidance
3.3.2.1. Any changes the Verifier makes to the report after completion/ during the facility review phase must be agreed upon by the facility	Should the facility and Verifier/VB agree to changes to the verified assessment report at this stage of review (VRC-Verification Completed status), the facility must change the status from “Verification Completed” to “Verification being Edited” and give the Verifier access to the report again through the Accredited Host platform so the Verifier can make the agreed changes.
3.3.2.2. After edits are finalized, the Verifier must change the status to “Verification Completed” so the facility can access the report again and review the changes	<ul style="list-style-type: none"> • This back and forth between facility review in status “Verification Completed” and Verifier changing the report in status “Verification being Edited” can occur as often as necessary within the 14 calendar days provided for review and editing. • The Accredited Host has a “countdown clock” feature which will help the facility and Verifier see how much time is left until the assessment is automatically finalized and the status is changed to “Verification Finalized”. • Emails will also be sent to the Verifier and facility to remind each party of the impending deadline.
3.3.2.3. If in status “Verification being Edited” (VRE), Verifier must work as quickly as possible to finalize the edits and change the status back to “Verification Completed” so the facility has enough time to review the report one last time before completion	Should the Verifier need to make edits to the report, as requested by the facility (from VRC to VRE) or by SLCP (after VRQ and before submitted to VRC), SLCP recommends that the Verifier again saves a copy of the report in Excel from the Accredited Host platform for their records prior to changing the status to “Verification Completed”.

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3.3.3. Requirements for Report Writing

Note: In addition to the correct Verification Selection and Corrected Response, Verification Data is essential for users to understand facility circumstances and make decisions on compliance levels, corrective action and remediation. Users use Verification Data to Inform compliance, grading, certification and/or remediation.

Refer to the below information and the [Verifier Guidance](#) for more details about report writing.

Requirement For Verification Selection	Guidance
<p>3.3.3.1. Verification Selection must be completed correctly following the specific rules explained in the column “Guidance”</p>	<p>There are five (5) Verification Selection options for the Verifier to manually select and three automated verification options that are automatically made for the Verifier by the Tool.</p> <p>The rules on what Verification Selection to choose are as follows:</p> <p>Accurate: Information provided by the facility is 100% correct and supported by data.</p> <p>Updated during Verification: This can only be found in the Facility Profile. When the Verifier arrives on-site the Facility Profile circumstances may be different from what they were during the self/joint-assessment. For all other questions, the assessment period only includes the 12 months prior to the submission date of the self/joint-assessment. However, for Facility Profile information, the Verifier must include the most up-to-date information which may require an update. These changes are not considered “Inaccuracies” but rather updates to the provided facility data.</p> <p>Inaccurate: Information provided by the facility has one or more errors; at least one data point shows that the answer is incomplete or incorrect (i.e., the facility answer is not 100% accurate); or information cannot be verified (i.e., the Verifier cannot prove that the facility answer is accurate).</p> <p>For example, if there is a lack of documentation that does not permit accurate verification of specific questions the Verifier must select “Inaccurate”. Example: A facility was using manual time keeping records, which were not consistent or complete. The facility switched to an electronic time keeping system 2 months before the verification. The facility was only able to provide 2 complete months of records to the Verifier. Questions that require review of time records must be marked as “Inaccurate”</p> <p>If the Verifier determines that the facility response is “Inaccurate”, the Verifier must select the corrected response.</p>

Note: The Corrected Response option is not applicable for Follow-up Questions where the facility provides a description. Therefore, the Corrected Response field is whited out. Since all Follow-up Questions have free narrative answers; the Verification Data 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."

Follow-up question numbers end with .1, .2, .3, in the Tool. For example, FP-BUI-7 asks, "Do workers stay in off-site housing managed by an entity other than the facility?" If the facility answers "Yes" then a follow up question appears marked by ".1" at the end of the number: FP-BUI-7.1: If yes, please provide details of the housing arrangements...": The facility responds with a free narrative answer. Any correction/ addition made by the Verifier can then be entered into the Verification Data field.

Facility did not reply during SA/JA: ~~The~~This means that the facility did not provide a response at all. Note, in the offline Tool this will be visible through the dark grey color, indicating that the facility has not provided a response. When the facility provides a response, the color changes to light grey.

AUTOMATED FEATURE: v1.4.2 of the CAF now automates this feature. The Verifier no longer needs to select "Facility did not reply during SA/JA" as it is automatically done for the Verifier in the offline and online version of the Tool. When going from the online AH platform to the offline Tool, the AH completes the "Facility did not reply during SA/JA" Verification Selection before the Verifier opens the offline Tool. This feature contributes to increased quality of the report as it eliminates the potential for error. Note: The Verifier must still enter the Corrected Response and provide Verification Data to support the Corrected Response.

Not visible to facility during SA/JA: The Verifier's Corrected Response has opened up conditional questions that were not there before for the facility to answer during self/joint-assessment, and therefore the facility response is blank. ~~The Verifier needs to select "Not visible to facility during SA/JA" and enter the Corrected Response.~~

AUTOMATED FEATURE: v1.4.2 of the CAF now automates this feature. The Verifier no longer needs to select "Not visible to facility during SA/JA" as it is automatically done for the Verifier in the offline and online version of the Tool. This feature contributes to increased quality of the report as it eliminates the potential for error. Note: The Verifier must still enter the Corrected Response and provide Verification Data to support the Corrected Response.

Example: In the Facility Profile answers will unhide questions in other Sections (Recruitment & Hiring, Wages & Benefits, etc.). If the Verifier finds that the facility was inaccurate by NOT selecting "X", "Yes" or entering a number >0 in worker demographics, and changes the Corrected Response to "X", "Yes" or a number above 0 then the conditional questions that were hidden for the facility become visible for the Verifier (further down in

various sections of the Tool). In this case, the ~~Verifier needs to select option~~ "Not visible to facility during SA/JA" ~~and will now be automatically selected in the Tool and the Verifier must then~~ enter Verification Data to support the Corrected Response.

If the Verifier finds that the facility answered accurately, the conditional questions remain hidden (if the facility did not select "X" or "Yes" or entered "0").

Not applicable due to special facility circumstances: This is likely to be rarely used. It offers Verifiers the option of noting if something is 'not applicable' if the question has no "Not Applicable" option. Facility circumstances that SLCP has not considered can come up and it is the responsibility of the Verifier to decide if these special circumstances mean that all answer options SLCP provides are not suitable. If this Verification Selection is chosen by the Verifier, then the Corrected Response column remains blank and must not be completed because the question is not applicable.

No longer applicable due to verification: The Verifier's Corrected Response makes the conditional questions that were answered (or not answered) by the facility in the self/joint-assessment no longer applicable.

AUTOMATED FEATURE: v1.4.2 of the CAF now automates this feature. The Verifier ~~can just no longer needs to select this~~ "No longer applicable due to verification" as it is automatically done for the Verifier in the offline and the online version of the Tool. This feature contributes to increased quality of the report as it eliminates the potential for error.

The Verifier does not need to ~~explain the Verification Selection choice~~ provide an explanation in Verification Data. ~~If Once this Verification Selection is chosen by the Verifier, then option has been automatically selected~~ the Corrected Response column remains blank because the question is not applicable. For the user of the verified data the Verification Selection alone ~~is~~ makes clear that this data can now be ignored due to verification.

Note: "No longer applicable due to verification" will be applied for conditional questions depending on the Corrected Response AND also if the Verification Selection of the parent question is "Not applicable due to special facility circumstances".

Verification not required: Applicable to a few questions where verification is not necessary. It is the only drop-down selection option in the Verification Selection. No Corrected Response can be completed/is needed. If the Verifier chooses to add comments under Verification Data they can do so, but it is not required.

The automated Verification Selection may be overridden by the Verifier, i.e., the Verifier can manually change the Verification Selection IF the Verifier thinks the system has made a mistake: however, the Verifier MUST raise a ticket to SLCP Support to advise of this change so SLCP can validate the change.

Requirements For Completion of Verification Fields Including Attachments	Guidance
<p>3.3.3.2. Depending on the Verification Selection, other verification fields must be completed/cannot be left blank</p>	<p>See Table 3 below for what cannot be blank (white cell), what could be blank depending on the circumstances (light grey cell) and what is not applicable and does not need to be filled in (dark grey cell).</p>
<p>3.3.3.3. Verification Data must be supported by photos/ attachments where feasible</p>	<ul style="list-style-type: none"> • See last column “Photo/ File upload to AH” in Table 3 for when attachments are required • See also Requirement 3.2.6. • Support material is required (if feasible) where the Verification Selection is “Inaccurate” and if there is a “Non-Compliance”
<p>3.3.3.4. Verifier must adhere to applicable data privacy regulations</p>	<ul style="list-style-type: none"> • This applies especially to narrative and attached photos/ documents • Photos must not contain worker names or any personally identifiable information for reasons of confidentiality and privacy • <u>If facility does not permit photographs due to confidentiality, then please note in report under the Verification Details section 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.</u> • <u>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 Details.</u>
<p>3.3.3.5. All fields in the Verification Details section must be completed</p>	<ul style="list-style-type: none"> • If the Verifier does not have any information to enter, the Verifier still has to complete the field with N/A. • Verifier should pay attention to the More Info links/fields to understand what to respond <u>to</u> in the Verification Details section. • The question in Verification Details about Verification Duration must be filled in with the total number of person days used for verification (which may also include virtual verification). E.g.- 1) 2 Verifiers for 2 calendar days is 4 person days. 2) 1 Verifier 1 calendar day virtual and 2 Verifiers 1 calendar day onsite is total 3 person days.

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Table 3: Requirements for Completion of Verification Fields

Verification Selection	Corrected Response	Verification Data	Non-Compliance	Legal Reference	Photo/ File upload to AH
NEVER BLANK For every question that appears in Tool (even if no response provided)					
		NEVER BLANK if Non-Compliance selected Must fill in narrative to explain the non-compliance so users of the verified data can make corrective action plans.	IF NON-COMPLIANCE OF APPLICABLE LEGAL REQUIREMENTS Non-Compliance selected with "X" ²	NEVER BLANK if Non-Compliance selected Must fill in legal reference information	MUST UPLOAD if Non-Compliance selected and if proof/ documentation available
Updated during Verification selected	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why update is necessary.			If proof/ documentation available to emphasize a point shared in Verification Data, then must upload
Inaccurate selected	NEVER BLANK	NEVER BLANK Must fill in narrative to explain why the facility's response was inaccurate and	As applicable	If Non-Compliance	MUST UPLOAD if proof/ documentation available

² Note that there is automation for Non-Compliance selection and Legal Reference narrative completion on the Accredited Host platform for select countries. Please see more information under the chapter [Identifying and citing when facility is not in line with legal requirements](#).

	Must select or fill in	share facility details so users of the verified data can make corrective action plans as necessary.		selected, must fill in narrative	
Facility did not reply during SA/JA <u>selected</u> <u>automatic selection</u>	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to explain why the facility did not respond, what Verifier reviewed to support answer and share facility details, as necessary, so users of the verified data can make corrective action plans, as necessary.	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Not visible to facility during SA/JA <u>selected</u> <u>automatic selection</u>	NEVER BLANK Must select or fill in	NEVER BLANK Must fill in narrative to briefly explain why this question is now applicable. If there is a Non-Compliance must fill in narrative. If there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding, the Verifier must share facility details so users of the verified data can make corrective action plans, as necessary.	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding AND if proof/ documentation available THEN must upload
Accurate selected		As applicable Must fill in narrative if <ul style="list-style-type: none"> • Verifier wants to provide additional information about facility circumstances 	As applicable	If Non-Compliance selected, must fill in narrative	If Non-Compliance selected OR if there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding

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		<ul style="list-style-type: none"> • If there is a Non-Compliance • If there is an issue that as per Verifier social audit experience would result in a Code of Conduct finding, the Verifier must share facility details so users of the verified data can make corrective action plans as necessary 			AND if proof/ documentation available THEN must upload
Not applicable due to special facility circumstances selected		NEVER BLANK Must fill in narrative to explain why there is a special facility circumstance that results in the Corrected Response not being applicable			If proof/ documentation available to emphasize a point shared in Verification Data, then must upload
No longer applicable due to verification selected automatic selection		Verifier can choose to leave comments			
Verification not Required		Verifier can choose to leave comments			

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Requirements For Verification Data	Guidance
<p>3.3.3.6. Verifiers must provide details in “Verification Data” that <u>clearly</u> explain clearly the reason for the specific Verification Selection and provide users of SLCP data with necessary information to inform post SLCP steps (including grading, certification and corrective action plans)</p>	<ul style="list-style-type: none"> • If Verification Selection is “Accurate”: there may be circumstances which make the situation unique or irregular. In these cases, the Verifier must provide additional information in Verification Data. <ul style="list-style-type: none"> – Example: The local law permits extra working hours daily due to the availability of less manpower. As this is in line with legal requirements, the Verifier would not enter a Non-Compliance. However, the Verifier would need to make note (even if the Verification Selection is “Accurate”) in Verification Data that there was an increase, how much and why and how many workers were affected by increase, etc., and that this is permitted by law. — <u>Example: Months reviewed, etc.</u> – <u>Other examples where the Verifier should include Verification Data where the selection is ‘accurate’ include (but are not limited to):</u> <ul style="list-style-type: none"> • <u>If the facility hires prison labor (number of workers, how often, types of work, etc.)</u> • <u>Reasons for inconsistencies between working hour, payroll, and other records</u> • <u>Reasons for workers exceeding 60, 72, 80 or 90 hours in total (regular + overtime) within any given week</u> • <u>Details on payment or non-payment of overtime or premium rates</u> • <u>Types of work-related activities outside of regular working hours for which workers are/ are not paid</u> • <u>Issues related forced labor, unethical recruitment, child labor, discrimination, harassment and abuse</u> • If Verification Selection is “Inaccurate”: the user of the data needs to understand what the accurate situation is (Corrected Response) and why the situation was not captured accurately by the facility in the self/joint-assessment (Verification Data). <ul style="list-style-type: none"> – Specifically, the Verification Data must state what types of evidence were reviewed AND details about the current circumstances at the facility. If applicable, Verification Data must address: <ul style="list-style-type: none"> ▪ number of persons affected ▪ name of the policy or procedure in question

- dates of the relevant records
 - place of incidence or activity
 - any other information that the user of the data should know to assist them with future follow-up or corrective actions, which are outside of the SLCP assessment process
- **If Verification Selection is “Updated during Verification”:** If Facility Profile responses need to be updated, the Verifier must indicate the reason for the update in Verification Data. Reasons provided by the Verifier can be a simple explanation like something changed between the date of self-assessment and verification.
 - **Example:** An additional production building was found during verification that was not mentioned in the facility’s self-assessment. In this case, the Verifier must select “Updated during Verification” in the Facility Profile and enter the correct number of production buildings. Under “Verification Data”. The Verifier should note why this information was not included in the self-assessment. If the Verifier suspects that the facility was deliberately providing inaccurate information, this should be noted under “Verification Data” and also repeated in Verification Details.
 - **If a facility addresses a specific issue that is not required by law in the country where the facility operates (e.g. time off for breastfeeding), the Verifier selects “No applicable requirements” and Verification Data must explain that the facility addresses the issue regardless of the absence of legal requirements.**
 - **If the final verified 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 Verification Selection is Accurate or Inaccurate), Verification Data must include details so that the user of the report can better inform remediation efforts.**
 - **Example:** A facility answers “Yes” to “Did any workers work more than 60 hours in total (regular + overtime) within any given week?” The data point is not a legal non-compliance according to the country’s law, and the Verification Selection is “Accurate”. However, the response presents a circumstance, that is likely to be a violation of most brand codes of conduct so Verification Data should describe further details.
 - **Example:** If the facility uses prison labor, follow up details on type and number of prison workers would help inform code of conduct or standard compliance requirements. Likewise, details should be provided in Facility Profile to provide clarity where appropriate.
 - **Example:** Building is shared with other facilities/enterprises; if applicable, the Verifier should provide information on the type and number of facilities / enterprises.

- If facility response includes more than one selection due to different processes occurring in the facility, the Verifier must provide users of the report with enough detail to explain the reason/processes behind the selections.
 - **Example:** The facility has different processes for clocking in and out for different types of workers (e.g., line workers clock in themselves but those who work in packing/shipping are clocked in by security guards). Therefore, there is more than one selection for the question “Who performs the clock-in/clock out function for workers?” – the individual worker and management. In this situation, verification data should explain that for some categories/types of workers the clocking in and out process is different.
- **If facility response if the verification selection is “Facility did not reply during SA/JA”,** the Verification Data must be a short statement of what information was reviewed to support the Corrected Response.
- Verifiers must provide an updated or more detailed description if the facility’s free text responses (e.g., “Please describe xxx”) do not provide a sufficient or clear description. This is applicable to questions with answer type “Response Here:”.
 - **Example:** A factory has several multi-floor buildings, and each building has a different number of floors. The facility must provide the number of floors for the main building and the Verifier must provide details on the other buildings at the site and how many floors they each have under “Verification Data”. The Verifier may upload a facility plan to the question to explain the facility layout better through an image]
 - **Note: Do not copy/paste any formatted data from a source into the CAF Tool free text/ narrative boxes as this can sometimes cause errors with certain characters. If copy/paste is necessary, you can remove formatting by first copying the text into Notepad (or a similar program that removes formatting) and then copy from Notepad (or similar) to the free text/ narrative box in the Tool.**

3.3.3.7. 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 Verification Data

- The only standard that applies to SLCP and must be addressed for every question outside of the Facility Profile is national labor law and international labor standards
- If verified response results in a Non-Compliance determination (no matter if the facility response is **Accurate or Inaccurate**), the user of the verified assessment report must understand the details of the Non-Compliance to better inform remediation efforts
- If the question does not refer to “in line with legal requirements”, but the Verifier identifies a situation during verification where the facility is not in line with applicable legal requirements, the Verifier must select “Non-Compliance” AND provide the “Legal Reference”

	<ul style="list-style-type: none"> • Facility Profile: The only Tool section where questions are included but no Non-Compliance option is provided for the Verifier is the Facility Profile section. If the Verifier identifies a Non-Compliance in this section, they must address the Non-Compliance in the Verification Details section, where the Verifier is provided an opportunity to provide free text narrative. • Legal Reference, at minimum, must consist of the specific location of the applicable law in the law text: <ul style="list-style-type: none"> – Name of law or regulation – Year or version no. or other identifying number of the law or regulation – Location of the applicable text in the published law or regulation, e.g., paragraph, article – The Legal Reference may also contain excerpts of the law or a summary of the information, as long as the information is in English. • Verifiers must enter legal issues correctly. This includes: <ul style="list-style-type: none"> – Raising a Non-Compliance when an “Inaccurate” Verification Selection relates to a legal requirement – Raising a Non-Compliance when an “Accurate” Verification Selection relates to a legal requirement. <p>See also information about the Law Overlay.</p>
<p>3.3.3.8. Temporary regulatory circumstances must also be explained in Verification Data, as applicable, and in the Verification Details section of the report</p>	<p>If during COVID-19, for example, certain laws were temporarily suspended or relaxed by local government, these laws must be considered only if applicable during the 12 months of self/joint-assessment data. And no matter the Verification Selection and final verified response, if there was a temporary regulatory circumstance this must be mentioned, as applicable, in the Verification Data and the Verification Details section of the report.</p>
<p>3.3.3.9. If the response to be verified is in reference to an activity occurring repeatedly, the Verifier must define the regularity applied by the facility</p>	<ul style="list-style-type: none"> • The regularity needs to be defined by the Verifier because there is no consensus on regularity unless legally required. <ul style="list-style-type: none"> – Example: “Are toilets clean, and sanitized on a regular basis?” If the response to this question is “Yes” then the Verifier must ensure that the user of the verified assessment report understands clearly what “regular” means within the context of this facility.
<p>3.3.3.10. If the facility misunderstood the question, the Verifier must enter</p>	<ul style="list-style-type: none"> • This Verifier requirement helps SLCP facilitate analysis of misunderstood questions to either improve the question or provide more info or training around the question.

<p>the exact word “Misunderstanding” at the beginning of the Verification Data field</p>	<ul style="list-style-type: none"> • <u>A “Misunderstanding” means that the facility did not understand the question properly.</u> <ul style="list-style-type: none"> – <u>Example of Misunderstanding:</u> Facility misinterpreted the question: “Is there on-site vehicle traffic at the facility?” Management thought this question only related to forklift traffic and answered “No”. But the facility had cars, trucks, and other motorized vehicle traffic, so the Verifier enters “Yes” as the Corrected Response and “Misunderstanding” in the Verification Data field. Then the Verifier explains the misunderstanding of the facility in the Verification Data field. • <u>A “Misunderstanding” does not mean the facility misjudged the facility circumstances because they were not aware of the real situation.</u> <ul style="list-style-type: none"> – <u>Not an example of Misunderstanding:</u> Facility misjudged the onsite situation and gave the wrong answer to “Emergency alarm system is fitted with a back-up power source”. Management thought there was back-up battery for the fire alarm, but the Verifier identified during the onsite tour that there was no back-up battery for the fire alarm. This is a case for “Inaccurate” without Misunderstanding. It is a real mistake by the facility and should be shown as such. It documents that facility management does not know its facility operations as well as it thought.
<p>3.3.3.11. The Verifier must provide enough details for the reader to identify if the situation is “isolated” or “systemic”</p>	<ul style="list-style-type: none"> • Isolated: Systems are in place but a temporary lapse in management of the system resulted in the current circumstance. <ul style="list-style-type: none"> – Example: Facility with a hiring system that has robust age verification procedures experiences child labor because they did not train the new human resources associate sufficiently on procedures. • Systemic: Issues that are purposeful, intentional, and methodical in nature that occur regularly and/or impact a significant number of workers. <ul style="list-style-type: none"> – Example: It was noted that the facility employs 10 juvenile workers whose hours are not monitored at all and 8 of them have worked over 30 hours a week for at least 2 weeks in a row, maximum 4 weeks in a row. This also is not in compliance with applicable legal requirements. Thus, Verifier applies a Non-Compliance and provides the Legal Reference.
<p>3.3.3.12. Verification Data clearly links to the question/ data point</p>	<ul style="list-style-type: none"> • The type and suitability of the evidence/data presented must be clear, and the statement should precisely support the accuracy determination of the Verifier by providing context and the source of evidence. • The statement must not be general, but specifically linked to the question being evaluated. Therefore, cutting and pasting of statements into multiple Verification Data fields is poor form.

<p>3.3.3.13. Verification Data is factual and without judgment</p>	<p>Verification Data must be limited to factual statements: Details provided (to provide users with enough information to take next steps) must not make a judgment on good/bad, compliance to a code/non-compliance to a code, except specifically related to compliance with applicable legal requirements. The Verifier is not telling the user how to remediate the situation in Verification Data, but rather sharing all the information necessary (isolated, systemic, who, what, why, where, when, how, how often, etc.) for the user to define remediation activities.</p>
<p>3.3.3.14. Verifier must enter all Verification Data in English</p>	<ul style="list-style-type: none"> • The SLCP final verified assessment report is a report in English. All users require data in English. This means that both the facility and Verifier are required to make entries in English only. • This also means that if the facility provided non-English data, the Verifier is responsible to <u>ensure translate</u> the <u>final verified facility's</u> response <u>is into</u> English <u>in the Verification Data field</u>. <ul style="list-style-type: none"> – Example: If a facility free text response in Chinese is “Accurate”, the final verified response will appear as the Chinese response. Since the user needs English data, the Verifier must translate the facility’s Chinese free text answer and enter the translated English text into Verification Data. The user will still see the “Accurate” Chinese text but can refer to the Verification Data to understand the data in English. • Refer to 3.1.5.4. under 3.1.5. Requirements for additional information.
<p>3.3.3.15. Verification Data uses correct spelling and grammar</p>	<p>It is very important that the information is entered using correct spelling and grammar so the user can easily understand the verified assessment report.</p>
<p>3.3.3.16. Verification Data statements must be based on the 12-month assessment period*</p>	<ul style="list-style-type: none"> • The assessment period for SLCP only includes the 12 months prior to the submission date of the self/joint-assessment. Verification Data statements are to be based on this assessment period <ul style="list-style-type: none"> – Example: Inconsistencies are found in the month of the verification; however, these records are out of the 12-month scope. Verifier can inform facility of inconsistency and ask the facility if they can include this information in the report. It is up to the facility to determine if the information can be included. Verifier is, however, permitted to look at all 12 months of the assessment period. If there is a current instance of inconsistency in the month outside of the 12-month assessment period, there may be another inconsistency elsewhere during the 12-month assessment period. The Verifier can see if they can find an inconsistency within the 12-month period. <p>*The only exception is in the Facility Profile section, where the Verifier must include the most up-to-date information which may require the Verification Selection “Updated during Verification”</p>

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3.4. VB Quality Check and Document Retention

3.4.1. Requirements for VB Quality Check		
Requirement	Guidance	Recommendations
<p>3.4.1.1. VB must conduct an internal quality check on the report (based on requirements and guidance listed in the Verification Protocol, Verifier Guidance and QA Manual) before it is submitted to the facility for review</p>	<ul style="list-style-type: none"> The VB is responsible for conducting an internal quality check on the report before it is completed for facility review. Once the VB has completed the quality check and the AH checks have been executed and, if applicable, resolved by the Verifier, the Verifier must “complete” the verification, this will result in the assessment status change from “Verification in Progress” (VRP) to “Verification Completed” (VRC). Before the status changes to “Verification Completed” (VRC), an automated SLCP data quality check is conducted behind the scenes in a hidden status called “Verification Quality Check” (VRQ). This search for data quality failures takes a few seconds. If the data quality check fails, the assessment status automatically changes to “Verification being Edited” (VRE) and an email is sent from info@slconvergence.org to all assigned Verifiers of the verified assessment report. The Verifier should then: <ul style="list-style-type: none"> Review the email which outlines all the failures Make changes to the verified assessment report, as necessary Finalize the report – again – by changing the status from “Verification being Edited” (VRE) to “Verification Completed” (VRC) Strive to complete the revisions and finalize the report within 4 calendar days. 	<ul style="list-style-type: none"> SLCP takes report quality very seriously. It is the responsibility of the VB to conduct quality checks (informed by the Verification Protocol, Verifier Guidance and QA Manual). The VRQ check is checking the work of the VB quality check. So, if the automated system identifies a valid failure, then the VB quality check is not rigorous enough. The VOO regularly evaluates VB performance, and report quality review is an important VB performance aspect. Although not a requirement, SLCP highly recommends the Verifier review the VRQ check failure email and make revisions to revise the report as applicable. Note that the VOO receives the VRQ failures and also receives a final quality check report after the report is finalized by the facility. As part of QA activity, the VOO can compare quality of the report

	<p>On calendar day 5 after the assessment status changes from “Verification in Progress” (VRP) (via “Verification Quality Check” (VRO)) to “Verification being Edited,” (VRE), the assessment status automatically changes from “Verification being Edited” (VRE) to “Verification Completed,” (VRC), whether the Verifier made edits or not. This guarantees that the assessment process continues, and the facility can start reviewing the verified assessment report.</p> <p>If the automated SLCP data quality check does not result in failures, the completion of the verification goes through, and the assessment is in status “Verification Completed”. SLCP regularly reviews and updates the automated data quality checks.</p> <ul style="list-style-type: none"> • Go to our Helpdesk to see which data quality checks SLCP is currently running. 	<p>prior to and after finalization. Any failures/ mistakes still in place will negatively affect the Verifier and VB score.</p>
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3.4.2. Requirements for VB Document Retention

Requirement	Guidance
<p>3.4.2.1. VBs must follow local legal requirements relating to the minimum retention of notes, documents, photographs and/or client files. SLCP requires at least 12 months of document retention to facilitate any Dispute or quality assurance procedures.</p>	<p>As the Verifier and VB do not have access to the finalized verified assessment report (status VRF), Verifiers should save a copy of the report (likely the offline Excel version) for their records prior to changing the status to “Verification Completed”. VBs can always ask the facility to share the finalized verified assessment report with them, but SLCP recommends downloading a copy at this point in the SLCP assessment process.</p> <p><u>Note: The Verifier and VB do not have access to the finalized verified assessment report because the facility owns the VRF report, and it is up to the facility with whom they want to share the report.</u></p>

3.4.3. Requirements for VRF Edits

<u>Requirement</u>	<u>Guidance</u>
<u>3.4.1.2. Under exceptional circumstances, Verifier must work with VOO to determine edits that may need to be made to the final verified assessment report post VRF.</u>	<ul style="list-style-type: none"><li data-bbox="651 411 2022 507">• <u>There may be exceptional circumstances where mistakes are not identified during the VB internal quality review or via VOO QA. In these cases, the VOO notifies the Verifier Body, Verifier(s) and Accredited Host of the situation and will temporarily change the status to VRE.</u><li data-bbox="651 528 2022 624">• <u>If the change is made directly by the VOO in coordination with the AH there will be no action necessary by the Verifier; however, there may be times when the Verifier will be instructed to make the change. The Verifier will the need to work with the VOO to determine the edits that need to be made.</u><li data-bbox="651 644 1211 676">• <u>See the SLCP QA Manual for further details.</u>

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3.5. Ethics

3.5.1. Anti-bribery Requirements	
Requirements	Guidance
<p>3.5.1.1. Accepting gifts of any value from facility managers, workers or others related to the verification is inappropriate and not permitted</p>	<ul style="list-style-type: none"> • Exceptions to the rule may include accepting offers for water, soft drinks, tea, coffee and snack food similar to the kind and value consumed regularly by those who are offering it. • SLCP adheres to a strict policy against bribery. In the event that a Verifier is offered money, gifts or other unsolicited items, the following procedure must be followed: <ul style="list-style-type: none"> – Refuse the offer immediately, and explain that such a practice is strictly prohibited – Take a photo of the item, if possible – Contact the <u>The Verifier must advise their</u> VB and or contact the VOO <u>immediately</u> to report the incident and <u>to</u> seek further guidance (based on the advice given, either abort the assessment or proceed with the verification. If the Verifier feels threatened or intimidated in any way, the verification should be aborted).
<p>3.5.1.2. Verifiers must never allow management to take them out for lunch during a verification nor accept payment for lunch</p>	<ul style="list-style-type: none"> • If the facility orders lunch, Verifiers must pay them back for the lunch and explain that this is SLCP policy. • Rides may be accepted to and from the facility only when there is no other option. When the Verifier(s) arrive at the facility, their behavior should reflect that of an independent third party. If workers see a Verifier coming out of a facility owned vehicle, workers may believe that they are working for the management and are therefore not independent. • If there is a security concern with transportation or during any other part of the verification, the Verifier must contact his or her VB.
<p>3.5.1.3. Verifiers/VBs must adhere to Annex I and Annex VI</p>	<ul style="list-style-type: none"> • See Annex I Professional Conduct and Annex VI SLCP Code of Conduct

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3.6. Reporting on sensitive issues and suspicious activities outside of the Final Verified Assessment Report

3.6.1. Identifying and reporting on sensitive and unconfirmed issues

Requirements	Guidance
<p><u>3.6.1.1. Verifiers and/or the VB must submit details about unconfirmed, sensitive or similar information as well as suspicions to the VOO related to their assigned facility via an online form</u></p>	<ul style="list-style-type: none"> • <u>The purpose of this form is to report to the VOO and SLCP sensitive or unconfirmed information or suspicions concerning the facility, which 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 applicable facility. The information may come from the verification and Verifier directly, or through other means like worker hotlines that the VB maintains. It may be information from the self-assessment or verification timeframe or information outside of the assessment timeframe.</u> • <u>Even if the Verifier was able to include the sensitive information in the verified assessment report and the facility let the report be published, it is important to also use this form to highlight the issue separately in a facility profile for the next Verifier Body/ Verifier, because the previous report is not always shared.</u> • <u>Examples include:</u> <ul style="list-style-type: none"> - <u>Sensitive information that could not be shared in the report because the Verifier has to keep the identity of the worker confidential to protect that worker from retaliation</u> - <u>Information of non-compliances or inaccuracies that could not be presented in the report because they were outside of the assessment scope timeframe and the facility did not want to include it in the report, even after the Verifier explained the benefits of being fully transparent and sharing more information. For example: 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 Verification Data</u> - <u>Suspicious, e.g., unverified interview statement or inability to properly triangulate a finding, and that finding:</u> <ul style="list-style-type: none"> o <u>Would result in an “Inaccurate” determination, but due to it being unconfirmed cannot be applied;</u> o <u>Indicates a potential legal issue or non-compliance to generally accepted codes of conduct (e.g., unconfirmed reports of verbal abuse, harassment)</u> - <u>Transparency or ethics issues, e.g.:</u>

- o Facility offers a bribe to Verifier and Verifier cannot include this information in the report
- o Unconfirmed concerns of facility not sharing accurate data, like maintaining double books or falsified records
- o Suspicion of interview coaching, hiding workers/ production, or other manipulation of the verification
- Suspicion 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.
- Facility management is obstructive or unprofessional
- If the Verifier Body has their own worker hotline as part of their service offering and is permitted to share the information with the VOO and SLCP:
 - o If that Verifier Body receives information about concerns/ potential non-compliances related to a facility in which the Verifier Body conducted a verification, please share via the form (information is welcome at any time, not only during or shortly after verification)

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**SOCIAL & LABOR
CONVERGENCE**

Virtual + Onsite³ Verification

~~³Virtual verification alone without an onsite verification is not permitted. “+ Onsite” is a reminder that virtual verification alone does not exist within SLCP.~~

4. SLCP Virtual + Onsite Verification Process

4.1. Introduction

SLCP has permitted only offsite documentation review, thus far. However, with improvements in web connectivity at facility sites and requests to reduce travel and onsite verification time and costs, SLCP now permits reduction in onsite verification time with execution of virtual verification activity. **It is always the facility's decision to permit the Verifier to engage in any virtual/ offsite verification activity.**

Onsite verification is still required, but due to inclusion of virtual verification aspects, the onsite time can be reduced. A reduced onsite verification still reflects a robust social and labor assessment because it continues to include the following onsite verification activity:

- Observations of conditions in the facility, which include the work area and facility surroundings,
- Review of working hours, wage and personnel records,
- Review of presence of policies and procedures onsite,
- Management interviews,
- Worker interviews, and
- Triangulation of all information.

For most facilities, full onsite verification will still be the best choice, as virtual activities may come with challenges such as technology failures and delay in transmission of data during virtual meetings. VBs who have executed virtual audits for certification schemes or brands have noted that virtual activities take on average 20% more time than the equivalent onsite activities, which can incur additional cost for the facility.

SLCP strongly recommends that only facilities who cannot hire local Verifiers, are exceptionally large sites, have a large workforce, have extensive management systems (numerous policies and procedures), or need to limit onsite time due to health and safety issues like COVID-19 should consider virtual verification activity. The below [SLCP Virtual + Onsite Verification Requirements](#) go into specific technology requirements a facility must meet to consider virtual verification activity.

4.2. Some Onsite Verification Requirements Apply to Virtual Verification

[Section 5](#) below presents the SLCP Virtual Verification Requirements that must be met to complete any virtual verification activity. At times these virtual verification requirements work in addition to or replace the SLCP Verification Requirements in Section 3. **If onsite and virtual requirements are the same, reference to the applicable requirements in Section 3 is made. These requirements apply to the verification no matter if the Verifier conducts virtual or onsite activities.** Any reference to [Section 3: SLCP Verification Requirements](#) in the below [SLCP Virtual Verification Requirements](#) is indicated in red with links provided to that specific requirement. [Return to the top.](#)

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SLCP Virtual + Onsite Verification Requirements

5. SLCP Virtual + Onsite Verification Requirements

These requirements are mandatory for Verifier Bodies and Verifiers. Guidance is provided for each requirement and is a critical component of the requirement that should be read together with the requirement. Some requirements are also accompanied with recommendations and/or references to provide further support throughout the virtual verification process.

Some virtual verification requirements must be met **in addition to onsite requirements** in Section 3. Links are provided to sections that need to be addressed alongside the virtual verification requirements. Other virtual verification requirements **replace onsite verification requirements**, and these will be indicated in **red** where relevant.

5.1. Pre-virtual verification

5.1.1. Requirements for Planning Different Types of Virtual Verification Activity
 Requirements in addition to [3.1.1. Requirements for Planning the Verification](#)

Requirement	Guidance	Recommendations
5.1.1.1. The Verifier must confirm the facility's eligibility for virtual verification	<ul style="list-style-type: none"> • Facility decides whether to include virtual verification activity. • Facility must request virtual verification activity before the VB determines general feasibility and also which specific virtual verification activity is feasible. 	
5.1.1.2. Facilities choosing Step 1 with 100 or less workers are not permitted to engage in virtual	<ul style="list-style-type: none"> • As onsite verification is still required, virtual verification activity is only permitted for facilities requiring more than 1 person-day for verification. 	

verification activity		
<p>5.1.1.3. Execution of virtual verification activity must always be announced</p>	<ul style="list-style-type: none"> • THIS REQUIREMENT REPLACES REQUIREMENT 3.1.1.3 IN SECTION 3.1.1 • Virtual verification activities must be announced to allow for timely meetings. • In planning, the VB must consider local/ national holidays as well as any specific dates or date ranges that the facility will be unavailable for verification. 	
<p>5.1.1.4. Verifier and the facility must discuss the IT systems and other requirements needed to support the virtual verification activity</p>	<ul style="list-style-type: none"> • The Verifier must confirm that the facility has a stable Internet connection with sufficient speed and bandwidth. This can be checked using free software (https://www.speedtest.net/). Testing should occur with actual systems in use. Stability is considered OK if (the below are general guidelines): • Ping<100 ms • Jitter<30 ms • Speed should be at least 10Mbps 	
<p>5.1.1.5. VB must discuss with the facility any information security and confidentiality issues that may arise from remote sharing of documents, records, and private</p>	<ul style="list-style-type: none"> • The VB must explain to the facility their rights under the General Data Protection Regulation (GDPR) and/or other applicable data protection laws and regulations. • The facility may be hesitant to share documents due to intellectual property (IP) restrictions and may require non-disclosure agreements to be signed prior to sharing confidential/IP restricted documents. 	

<p>information pertaining to workers</p>		
<p>5.1.1.6. Virtual verification for documentation review must use one of the approved remote sharing mechanisms</p>	<ul style="list-style-type: none"> • The facility must be able to share documents remotely to permit virtual/ remote documentation review. This includes: <ul style="list-style-type: none"> – Sharing screens during the virtual verification activity so Verifiers can review documents – Emailing documents to a Verifier so they can be reviewed – Sharing documents through a file sharing platform (e.g. Dropbox, Baidu, etc.) – Uploading all documents to the Accredited Host platform with the self/joint-assessment – Using a video camera to display documents. • The facility decides what format to use for remote/ virtual document sharing and the VB decides if they can accommodate the facility’s choice. • File formats accepted: PDF, JPG, Word, Excel 	<p>SLCP recommends that larger documents (e.g. workplace policies and procedures) are shared as softcopies via email or a secure website like the Accredited Host platform.</p>
<p>5.1.1.7. Virtual verification activity for document review, walkthrough or interviews must be conducted using videoconference software</p>	<ul style="list-style-type: none"> • The videoconference software used must support: <ul style="list-style-type: none"> – Screensharing (for documentation review) – 2-way live video (for interviews, walkthrough and documentation review) – Screenshot capability (to replace photos) – Ability to take photographs with a cell phone/camera • Recommended videoconference software feature <ul style="list-style-type: none"> – Chat (so users can type questions; especially useful in loud areas for virtual walkthrough or when there are connectivity issues) • The type of videoconferencing software to be used must be agreed upon by the VB and the facility 	<p>SLCP recommends that the VB use videoconferencing software they are familiar with and have used. If the VB is using a software of the facility’s choice, it is the VBs responsibility to ensure Verifiers understand how to use the software PRIOR to the virtual verification activity.</p>
<p>5.1.1.8. Verifier must confirm</p>	<ul style="list-style-type: none"> • The facility staff chosen for virtual verification activity need to have the ability to share their screens for the record review 	

<p>relevant facility staff have the ability to share screens if record review should take place via screen sharing</p>	<ul style="list-style-type: none"> • This must be determined before the virtual verification activity begins 	
<p>5.1.1.9. For virtual walkthrough activity, the Verifier and facility must discuss areas of the facility where noise levels may disrupt communication. Where complex communication cannot be facilitated through technology, an onsite walkthrough is required.</p>	<ul style="list-style-type: none"> • Since noise on the production floor may make it difficult for the Verifier and the facility to communicate, the chat feature on the videoconference software may be used to communicate and/or the designated cameraman should use headphones with an integrated microphone. • In areas where hearing protection is required, all communication should be done through the chat feature, or the walkthrough of this area should be postponed to the onsite verification. • Where complex communication is not possible or feasible using the chat feature of the video conferencing software, these facility areas must be visited during the onsite verification. 	
<p>5.1.1.10. Verifier must obtain a map of the facility to enable any virtual</p>	<ul style="list-style-type: none"> • As with an onsite walkthrough, all relevant parts of the facility must be included in the virtual walkthrough. It is therefore essential that the Verifier obtain and study a map of the facility and its premises in order to ensure that the entire facility (including areas such as dormitories and childcare facilities) 	

walkthrough activity and ensure all applicable facility areas are visited virtually or with onsite walkthrough	is covered during the virtual walkthrough.	
5.1.1.11. Verifier must conduct the virtual verification without an interpreter	<ul style="list-style-type: none"> To facilitate smooth virtual communication with management (opening meeting, management interviews, documentation review), the Verifier must be able to fully understand and speak the language used by management. Worker interviews are not included in virtual verification activity. 	

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5.1.2. Requirements for Assigning a Verifier

Requirements in addition to [3.1.2. Requirements for Assigning a Verifier](#)

Requirement	Guidance
5.1.2.1. The Verifier(s) conducting the virtual activity must also be involved in the onsite activity	<ul style="list-style-type: none"> <u>This means a Verifier cannot participate 100% remotely in a verification. They must have some onsite time, calculated in minimum 0.5 person-day increments.</u> Onsite activity after virtual activity must be seen as a continuation of the verification event. There must therefore be continuity in the Verifier(s) conducting the onsite verification after virtual verification. <u>Additional Verifiers (in addition to the original Verifier(s) conducting the virtual activity) are permitted for onsite verification. This means Verifiers not involved in the previous virtual activity can participate 100% only onsite.</u> <u>Examples of permitted assignments:</u>

- Example A: 4 person-day verification with two Verifiers
 - o Day 1
 - Verifier A = Virtual
 - Verifier B = Onsite
 - o Day 2
 - Verifier A = Onsite
 - Verifier B = Onsite

- Example B: 4 person-day verification with three Verifiers
 - o Day 1
 - Verifier A = Virtual
 - o Day 2
 - Verifier A = Onsite
 - Verifier B = Onsite
 - Verifier C = Onsite

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5.1.3. Requirements for Assigning Virtual Verification Activity Time

Requirements in addition to [3.1.3. Requirements for Assigning Person-days](#)

Requirement	Guidance
<p>5.1.3.1. Virtual and onsite verification activity must take place within an 8-calendar day period. If the combined virtual and onsite verification activity cannot take place within an 8-calendar day period, the VB must file an Exception Request.</p>	<ul style="list-style-type: none"> • Virtual verification activity should aim to be consecutive, but there can be some flexibility in planning. If not consecutive, the virtual verification activity and onsite verification activity combined must take place within an 8-calendar day period. • Depending on the scope of verification, virtual and onsite verification should ideally be consecutive and occur within the same working week to make sure data are consistent. • For onsite activities after virtual activity, the same requirement applies as for verification using no virtual activities: Person days should not exceed 4-calendar days: onsite, <u>Onsite</u> activities that require more than 4 calendar days must involve 2 Verifiers.

<p>5.1.3.2. All virtual verification activity must be completed before the onsite verification activity</p>	<ul style="list-style-type: none"> • Full onsite verification activity time can be 15-20% less than when verification is conducted in an onsite + virtual combination. This is due to scheduling virtual meetings, possible technology/ WIFI/ internet issues, relying on a facility member to execute the activities virtually with Verifier instructions, facility staff being new to virtual meetings, etc. • The exact time required to conduct any or all permitted virtual verification activities will be up to the professional judgment of the VB/Verifier. This is because the scope of selected activities and the scope of work within each type of virtual verification activity will depend on facility circumstances and their self/joint-assessment data. • The completion of combined virtual and onsite verification activity must take place within an 8-calendar day period. • The Verifier(s) conducting the virtual activity must also be involved in the onsite activity, although additional Verifiers are permitted for onsite verification.
<p>5.1.3.3. VB and facility must maintain flexibility in the verification plan to allow for a possible extension of onsite verification time if virtual verification activity fails due to unexpected circumstances</p>	<ul style="list-style-type: none"> • Although every effort should be made in the planning stage (5.1.1 Requirements) to avoid any unexpected issues, virtual verification activities may not go as planned and cannot be completed. In this case, the Verifier must still meet the verification requirements and fulfill all required verification activities through onsite verification. This likely means the onsite verification time will increase due to inability to complete planned virtual verification activities. <p>If the onsite verification timeframe has to be increased and the combined virtual and onsite verification time exceeds 8 calendar days, the VB must complete an Exception Request.</p>
<p>5.1.3.4. Person-days must be reduced in 0.5 person-day increments</p>	<ul style="list-style-type: none"> • The increment is 0.5 person-days because: <ul style="list-style-type: none"> – Minimum increases in person-days (for Step selection and workforce size) are set at 0.5-1 person-day increments, and – Adherence to requirements are spot-checked by the VOO, and the increment allows them to more easily check the accuracy of person-day calculations <u>more easily</u>. • Reductions in onsite time can therefore be 0.5 or 1 or 1.5 person days, etc., depending on the scope of virtual verification activity. • The required virtual verification activities to combine and execute in order to achieve a minimum 0.5 person-day reduction in onsite time is up to the professional judgment of the VB/Verifier.

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5.1.4. Requirements for Calculating Number of Person-days, Interviews and Documents to Review

Requirements in addition to [3.1.4 Requirements](#) with use of Table 4 in addition to Table 2 which enforces overall sampling numbers that apply to the virtual + onsite verification activities as a whole

Requirement	Guidance
<p>5.1.4.1. Verifier must follow Table 4 below if conducting virtual wages/ hours records review</p>	<ul style="list-style-type: none"> • Onsite verification activities must not exceed 4-calendar days- (with or without virtual activities); if more person days are required, more Verifiers must be added. • There is a maximum threshold for wage/ hours records virtual review for each level of number of workers. • Personnel records must be reviewed onsite corresponding to the workers interviewed onsite. • Verifier is permitted to review personnel records virtually if needed (see Requirement 5.2.1.4.) but those personnel records reviewed virtually do not count toward the required minimum.

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Table 4 below provides calculations for sampling wage and hours records permitted for virtual verification. Table 4 is to be applied along with calculations in Table 2 in [Section 3.1](#) when conducting virtual + onsite verification.

Table 4: Sample of wage and hours records permitted for virtual verification

Note: ~~For minimum~~ **Minimum** number of worker interviews and personnel records review (to be ~~only done onsite~~) (see [Table 2](#)).

Number of Workers	Wage & Hours Records Total (virtual and onsite)	Maximum Number of Wage & Hours Records permitted for virtual review	Consequences for onsite verification activity if maximum number for wage & hours records review is applied
1 - 100	10 x set of 3 = 30	0 – no virtual verification activity permitted. See Requirement 5.1.1.2. under 5.1.1 . Requirements	12-14 onsite # workers interview 12-14 onsite # personnel records review 10 x 3 (30) onsite wage & hours records
101-200	20 x set of 3 = 60	6 x set of 3 = 18	20-24 onsite # workers interview 20-24 onsite # personnel records review 14 x 3 (42) onsite wage & hours records
201 - 500	27 x set of 3 = 81	8 x set of 3 = 24	27-33 onsite # workers interview 27-33 onsite # personnel records review 19 x 3 (57) onsite wage & hours records
501 - 1000	40 x set of 3 = 120	12 x set of 3 = 36	36-44 onsite # workers interview 36-44 onsite # personnel records review 28 x 3 (84) onsite wage & hours records
1001+	55 x set of 3 = 165	17 x set of 3 = 51	52-64 onsite # workers interview 52-64 onsite # personnel records review 38 x 3 (114) onsite wage & hours records

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5.1.5. Requirements for Review of Self/Joint Assessment

See [3.1.5.](#) Requirements.

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5.1.6. Requirements for Pre-verification Communication to Facility

Requirements in addition to [3.1.6. Requirements](#)

Requirement	Guidance
<p>5.1.6.1. 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</p>	<ul style="list-style-type: none"> • The virtual + onsite combination verification plan will require more detail than the plan for just an onsite verification. It must adhere to the 8-calendar day timeframe and outline all times, dates and personnel required for virtual and onsite verification activity. See Verifier Guidance for sample of a verification plan. Also see the Helpdesk for <i>A Guide to Virtual + Onsite Verification for Facilities</i> which provides Verification Protocol information about virtual + onsite activities in a more digestible format to facilities. • All virtual activity has to be completed before the onsite activity. • As part of the pre-verification planning the VB/Verifier must determine if there are management staff that must be onsite at the facility during the virtual verification to share/review documents or explain procedures through onsite demonstration.
<p>5.1.6.2. Verifiers must have facility permission if Verifiers want to record the virtual verification sessions</p>	<ul style="list-style-type: none"> • Verifiers may not record the virtual verification sessions unless the facility has given written permission. • Note specific requirements prohibiting recording of sessions are in place under 5.2.1. Requirements (5.2.1.6.). • SLCP recommends the use of screenshot functionality. • Similar to onsite verifications, the Verifier must ask the facility for permission to take pictures during the opening meeting/ pre-verification meeting prior to starting the virtual activity.
<p>5.1.6.3. Verifiers are not permitted to record interviews</p>	<ul style="list-style-type: none"> • Interviews must not be recorded, even if facility provides express permission to do so. • Communication to the facility in advance of the virtual verification activity will include explaining that virtual

	interview activity will not be recorded.
<p>5.1.6.4. Verifier and the facility must discuss the IT systems and other requirements needed to support the virtual verification no less than 10 working days prior to verification</p>	<ul style="list-style-type: none"> • Scheduling key IT requirements would have already been discussed to ensure virtual verification activity is feasible. See 5.1.1. Requirements for Planning Virtual Verification Activity • The Verifier must confirm which areas of the facility have WIFI connections. If there are areas of the facility with no WIFI connection, then the Verifier must determine if those areas of the facility can be inspected virtually using a 4G data connection on a mobile phone or similar device, or if those areas shall be part of the onsite walkthrough.
<p>5.1.6.5. Verifier must ensure the facility has a staff person available throughout the verification who is responsible for using mobile phone or similar device to provide video access</p>	<ul style="list-style-type: none"> • Ideally the facility will designate a single staff person to be the “cameraperson” (the individual in charge of operating the camera during the virtual verification, especially during the virtual walkthrough).
<p>5.1.6.6. Verifier must conduct a pre-verification meeting using the videoconferencing software that will be used during the virtual verification activity</p>	<p>During this meeting the Verifier must:</p> <ul style="list-style-type: none"> • Explain the virtual verification methodology to facility management • Test the video conferencing software, including using it in production areas

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5.2. Virtual Verification

5.2.1. Verification Protocol Onsite Activities that can be Replaced by Virtual Activity

Requirements in addition to 3.2.1 to 3.2.6. Requirements under [3.2. Requirements](#). If onsite Requirements are adapted for virtual verification, it is explicitly noted in the guidance.

General Requirement	Guidance
<p>5.2.1.1. Should all permitted virtual verification activities take place, the Verifier must follow the required sequence of virtual verification activities prior to going onsite (see guidance for specifics)</p>	<ul style="list-style-type: none"> • Any one of the virtual activities detailed in this table can be selected by the facility and confirmed by the VB/Verifier. Inclusion of activities will depend on Step selection, technology requirements, document sharing permissions, etc. as per the Requirements. • The Verifier must follow this sequence of virtual verification activities prior to going onsite if all permitted virtual verification activities are to take place: <ol style="list-style-type: none"> 1. Pre-verification meeting 2. Opening meeting (which can fully replace the onsite opening meeting if all required attendees are present) 3. Documentation review of soft copies of all policies and procedures (taken from SLCP document list and documents listed in self/joint-assessment) 4. Management interviews to further understand policies and procedures and review further documents that could not be shared as soft copies 5. Second round of documentation review, as applicable, to ensure data from interviews match documentation provided 6. Virtual walkthrough/onsite observation 7. Wage and hours records review 8. Scheduling of further virtual verification activity as per 2.-5. if Verifier has follow-up questions or open items
<p>5.2.1.2. Verifiers must thoroughly document virtual information gathering to facilitate the cross-</p>	<ul style="list-style-type: none"> • Same Requirement applies to 3.2.1.6. Verifiers must cross-check information gained from observation and documentation review with information gathered from the interview process with both management and workers to understand how workers are affected by various situations

<p>checking of information with (further) onsite management interviews, (further) onsite documentation review, (further) onsite walkthrough and workers interviews which are only permitted onsite</p>	<ul style="list-style-type: none"> • Verifier still needs to follow the general principle of “triangulation”. • However, when verification is split into virtual and onsite and the goal is to reduce onsite verification time, the Verifier must diligently take notes (including permitted screenshots) and ensure the required onsite follow-up activity related to the already executed virtual activity is clear. • Virtual verification findings will need to be incorporated into the Verification Data narrative of the Tool.
<p>Opening Meeting Requirements</p>	<p>Guidance</p>
<p>5.2.1.3. Verifiers are permitted to conduct the full opening meeting virtually in place of the onsite opening meeting</p>	<ul style="list-style-type: none"> • As the virtual and onsite activity must be scheduled consecutively and within an 8-calendar day maximum timeframe, the opening meeting can function as the kick-off to the virtual + onsite verification process • Once onsite, the Verifier can then immediately commence with walkthrough, interviews and/or documentation review • The requirement for video conferencing applies, see Requirement 5.1.1.7. • Also see 3.2.2. Requirements <ul style="list-style-type: none"> • 3.2.2.2 Authorization to take pictures must be requested: for virtual verification pictures are considered screenshots or use of camera to photograph the computer/ tablet screen • 3.2.2.4 If applicable, Verifiers must inform management that they wish to interview the head of the union(s) and worker representative(s): this should already have been scheduled and included in the verification plan under Requirement 5.1.6.1.
<p>Document Review Requirements</p>	<p>Guidance Also see 3.2.5. Requirements</p>
<p>5.2.1.4. Verifiers are permitted to review documentation virtually or remotely as long as it is appropriate, sufficient and in compliance with applicable data privacy regulations</p>	<ul style="list-style-type: none"> • All types of documentation review can be conducted virtually or remotely if the facility permits, and applicable privacy regulations are followed. • Appropriate documentation means the documents provide evidence or further context related to the Tool question. • Sufficient documentation means that the Verifier can fully or partially verify the self/joint-assessment answer to the question by documentation review only. More information through Verifier observation or interviews may be

necessary to fully verify the answers.

- If the documentation is neither appropriate nor sufficient, virtual/remote review can be declined by the Verifier, as the Verifier cannot execute proper virtual/remote verification. The Verifier must explain in detail why virtual/remote verification is not possible.
- There will still be additional required onsite documentation review for wages and hours records that are associated with workers interviewed onsite.
 - This specific portion of documentation review cannot be replaced virtually, i.e., only some wage/ hours records review can be conducted virtually. See Requirement 5.2.1.12. below.
- **Personnel records will only be reviewed virtually if the virtual review of wages/ hours records leads to questions that must be answered with the review of the personnel records. The overall number of personnel records to be reviewed as per [Table 2](#) will not be reduced if this virtual activity occurs.** The number of personnel records to be reviewed is for onsite review only.
 - **Example:** A worker received a reduction in pay or a fine due to a disciplinary issue and this is reflected in payroll. The Verifier therefore asks to check documentation for the disciplinary incident in the worker's personnel file.
- Apart from the wage/ hours/ personnel records that must be reviewed onsite, if the facility is able to share most but not all of the required documents remotely, virtual verification activity may still take place. The remaining documents can be checked during onsite verification. The Verifier will also verify that documents shared virtually are available onsite during onsite verification.
 - **Example:** A facility can choose to have a virtual documentation review done for Health and Safety but not for labor conditions. The Verifier will need to verify labor conditions onsite, while also verifying existence of Health and Safety documentation provided virtually during onsite verification.
- **Note:** ~~the~~**The** Verifier does not need to re-verify documents checked virtually when onsite, however, the Verifier does need to verify that the documents are kept at the facility and not at head office or somewhere else.
- **It is the responsibility of the Verifier to ensure that certain documents best checked onsite should not be checked virtually.** For example: checking machinery licenses should be checked onsite to verify corresponding identification numbers, while policy/ procedural documents can be checked virtually with implementation of these policies and procedures checked onsite.

<p>5.2.1.5. During onsite verification, Verifiers must ensure that policy documents shared virtually are physically available onsite</p>	<ul style="list-style-type: none"> • Policy documents must be located at the facility, so they are accessible to all facility personnel. Policies need to be located where they are intended to be executed. • Onsite verification of documents ensures value and credibility to the virtual verification process.
<p>5.2.1.6. Verifier is not permitted to record virtual document review and must ask for permission to take screenshots during opening meeting or pre-verification meeting</p>	<ul style="list-style-type: none"> • For protection of privacy, information security and confidentiality, virtual documentation review cannot be recorded. • If the document does not breach privacy and confidentiality (or private or confidential information is blacked out), the Verifier may ask the facility if the Verifier can take a screenshot for attachment purposes (attachment to the verified assessment report). • Similar to onsite verifications, the Verifier must ask the facility for permission to take pictures during the opening meeting/ pre-verification meeting prior to starting the virtual activity. • Also see 3.2.6. Requirements.
<p>Management Interview Requirements</p>	<p>Guidance</p>
<p>5.2.1.7. Management interviews follow the same Requirements as onsite management interviews, with one exception (see guidance for details)</p>	<ul style="list-style-type: none"> • Management does not need to be present at the facility for the virtual verification activity to take place. The interviews can happen at a place that best suits the interviewee, but requirement for video conferencing still applies, see Requirement 5.1.1.7. <p>Also see 3.2.4. Requirements</p>
<p>Virtual Walkthrough with Onsite Observation Requirements</p>	<p>Guidance</p>
<p>5.2.1.8. Virtual walkthrough is permitted to reduce onsite walkthrough activity. Onsite walkthrough is still required on a sampling basis (see 3.2.3 Requirements)</p>	<ul style="list-style-type: none"> • Virtual walkthrough can be conducted as per the Requirements 5.1.1, and in particular 5.1.1.9. • The sample for onsite walkthrough must focus on re-examining possible high-risk factors (dangerous machinery, working from heights, uneven walkway/ surfaces, chemical storage, etc.), and examining the sensory environment (noise, fumes, and temperature) to determine use of personal protective equipment or other risk mitigation measures like ventilation, temperature controls, etc.

	<ul style="list-style-type: none"> • During the virtual walkthrough the Verifier uses video conferencing to visually verify the implementation of policies and procedures and observe workplace health and safety practices, see Requirement 5.1.1.7.
<p>5.2.1.9. During the virtual walkthrough, the Verifier must use the facility map to identify the parts of the facility they must observe, and they must direct the walkthrough</p>	<ul style="list-style-type: none"> • The Verifier must instruct the facility cameraperson to use the camera feature on the videoconference software (computer, tablet, phone or other device the facility is comfortable with and can support videoconferencing capabilities) to allow them to view all parts of the facility. It is important for Verifiers to direct the facility cameraperson on which parts of the facility they want to view, rather than allow the facility to direct the virtual walkthrough. • During the virtual walkthrough the Verifier should be sure to ask questions to ensure the entire facility is covered. Questions like “where does that hallway lead to?” or “what processes take place on this floor” can help confirm that what the Verifier is viewing is in line with the provided map. • The Verifier must ask the facility to open doors to help confirm the accuracy of information. • If displaying using a mobile phone, the facility cameraperson should use horizontal format to display the environment. • SLCP encourages the Verifier to take pictures/ screenshots during the virtual walkthrough. See Requirement 5.1.1.7. that required screenshot capability.
<p>Wages and Hours Records Review Requirements</p>	<p>Guidance Also see 3.2.5.2 Requirement under 3.2.5. Requirements</p>
<p>5.2.1.11. The facility must have an electronic system that maintains electronic copies of wages and working hours records in order to conduct wage and hours review virtually</p>	<ul style="list-style-type: none"> • If the facility has an electronic system that maintains electronic copies of wages and working hours records, they are eligible to conduct this verification activity virtually, but the review must happen using screensharing on the device that houses/has access to the electronic data (likely a computer or tablet). • The facility is not permitted to email copies of these records, take pictures of these records or share through other means.
<p>5.2.1.12. The sample of total number of workers to interview and records to review is still as per Table 2 and all worker interviews must occur onsite, but worker</p>	<ul style="list-style-type: none"> • The guidance under Requirement 3.2.5.1. notes: The data collected during interviews must be checked against documentation to ensure that all information matches. The individuals interviewed will form part, but not necessarily all, of the sample of persons whose personnel files and payroll are verified. The Verifier may decide [...] to concentrate a review of personnel files or payroll on a set of specific workers or on those persons with the highest/ lowest hours or wages per pay period. That decision is at the discretion of the Verifier.

<p>records review can occur beforehand and virtually</p>	<ul style="list-style-type: none"> • The virtual review need not be correlated with the worker interviews onsite apart from 5.2.1.15. It is recommended to conduct interviews first and then match the remaining record review with those interviewed; therefore, interviewees are not known beforehand and there can be no influencing or coercion of interviewees. • This allows the Verifier to review <i>some</i> wage/ hours records without the corresponding interview of the worker. See Table 4. • Triangulation of information is still key, and thus the majority of wage/ hours records review should be of those workers who were interviewed onsite. SLCP recommends that if virtual wage/ hours records review took place, the subsequent onsite wage/ hours records review corresponds 100% to workers interviewed onsite. • 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. • Should the Verifier need to re-review the records from the virtual record review due to new information discovered (e.g., worker interviews or onsite walkthrough), the Verifier shall proceed with the repeated review, but still has to complete the minimum onsite record review scope as per Table 2.
<p>5.2.1.13. If Verifier engages in wage/ hours records review, the full 3 pay periods of wage and hours records for that selected worker must be reviewed</p>	<ul style="list-style-type: none"> • See 3.2.5.2 Requirement under 3.2.5. Requirements • The Verifier cannot only review some pay periods. The entire 3 pay period set for that worker has to be reviewed. As per Requirement 3.2.5.2, any closure pay periods need to be reviewed in addition to complete the required full set of records to review.
<p>5.2.1.14. Verifier must include a “real time” review of working hours/ wage/ personnel records</p>	<ul style="list-style-type: none"> • A “real time” review of working hours/ wage/ personnel records is done by obtaining a list of workers present at the facility at the time of virtual verification and checking the records as per Requirement 3.2.5.2 and selection requirements (Requirement 3.2.4.2. Verifier must interview a representative sample of workers). • If virtual working hours/ wage/ personnel records review is feasible, Table 4 shows how the records review can be conducted with a maximum number of records to be reviewed virtually. The Verifier can always opt to do more review than the overall (virtual + onsite) minimum requirement onsite.
<p>5.2.1.15. Verifier always selects half of the workers included in the</p>	<ul style="list-style-type: none"> • The workers will be selected at random, and the facility will not be notified about workers selected for interview until the Verifier is onsite. • This approach will facilitate triangulation of information and permit the onsite reduction in records review.

virtual record review for onsite interviews

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5.3. Post-virtual Verification

5.3.1. VOO Quality Assurance and Report Writing Procedures for Virtual Verification Activities

Requirements to be met in addition to those in [3.3.3. Requirements for Report Writing](#)

Requirement	Guidance
<p>5.3.1.1. VB must maintain all records of virtual verification activity review and maintain an accurate account of the verification plan</p>	<ul style="list-style-type: none"> To ensure proper quality assurance activities, which also include review of required person days/ time spent on verification, the VB is required to maintain all records such as: <ul style="list-style-type: none"> All Verifier notes Electronic session logs, if applicable. Accurate account of the verification plan means the plan shared with the facility must be updated to show the real dates and start and end times of virtual sessions.
<p>5.3.1.2. The Verifier must include all information on virtual verification activity in the “Verification Details” section of the verified assessment report and attach the verification plan with details of the activity and the extent of the activity that was conducted virtually</p>	<ul style="list-style-type: none"> See example narrative for Verification Details and sample verification plan in Verifier Guidance. Verification plan must not only have accurate account of dates and times of virtual verification activity but also include, at minimum: <ul style="list-style-type: none"> Activities that took place (pre-verification meeting, opening meeting, management interviews, etc.) The amount of time spent on desktop/ remote review of documents (documents not shared via virtual conference but attached via AH platform to the self/joint-assessment or sent to/shared with Verifier electronically) Documents reviewed (Name, version/ date of document) Persons interviewed (Name, title, responsibility)

- Records reviewed (which months that correspond to requirement of recent, high/low/closure season, number of records reviewed)
- Facility plan attached at end of verification plan
- Areas of facility visited
- If not all of facility visited, then list of areas visited corresponding to the facility plan or areas visually marked directly on the facility plan, as applicable
- **The question in Verification Details about Verification Duration must be filled in with the total number of person days used for virtual + onsite verification.** E.g. 1 Verifier 1 calendar day virtual and 2 Verifiers 1 calendar day onsite is total 3 person days.

6. Commonly asked questions

SLCP and Sumerra have developed an online list of useful questions asked by Verifiers and answered by SLCP/ Sumerra. Before submitting a ticket on the SLCP or Sumerra helpdesk, we recommend first visiting <https://slconvergence.org/verifier-qa> to see if your question has already been answered. The questions are organized by topic to help you easily search for an answer and we are adding to it regularly.

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Annex I Professional Conduct

SLCP considers all Verifiers to be representatives of their VBs when engaging with manufacturers. SLCP expects that all Verifiers will behave in a manner that:

- (1) demonstrates the highest levels of ethics, professionalism, and respect
- (2) maintains integrity by ensuring neutrality and avoiding any conflicts of interest
- (3) safeguards the well-being of the Verifier team.

Note: that any sign of bias, favoritism and/or wrongdoing, even if perceived, could compromise the validity of the verification process.

Prohibition on Sales

At no time should Verifiers engage in selling consulting or other services by their organization.

Confidentiality

All information shared between the Verifier and a facility worker or manager and all information the Verifier gathers in the course of his or her verification is the property of the facility and must be kept strictly confidential. Such confidential information can be shared only within verified assessment reports and to parties designated by the facility. Verifiers may not e-mail or give hard copies of the verified assessment template or report to any party other than the applicable Accredited Host and/or SLCP administrator in instances where technical failure has occurred.

Impartiality

The Verifier must maintain impartiality at all times. They must not take sides or appear to be taking sides in the event of any dispute at a facility. All complaints by facility workers, managers and/or third parties are to remain allegations until they have been properly investigated and objective evidence is found to support the claim(s).

The Verifier must also disclose if they have had any personal or professional affiliation or relationship with the employment site that is subject to the verification.

Respectfulness and Professionalism

The role of a Verifier is to effectively and impartially gather information which requires listening to the perspectives, opinions, and comments of all stakeholders regardless of their position within the facility.

Verifiers must be respectful of facility owners, managers, production workers, and other persons who may be involved in the verification. Verifiers must be sensitive and respectful of gender, racial, cultural, and socio-economic issues. Acting in a demeaning, confrontational, or harassing manner to any persons before, during, or after a verification will not be tolerated. Verifiers must possess effective listening skills and awareness of non-verbal communication.

Verifiers must always be courteous, conscientious and be generally business-like in demeanor in the workplace. Verifiers must dress and act in a professional manner at all times. Verbal or physical altercations of any type will not be tolerated between Verifiers and facility workers or management/ owners

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Personal Safety

There may be cases where/when travelling alone is not considered safe due to local conditions, gender, or other reasons. In these cases, additional personnel or escorts must be included as part of the verification team. Verifiers that feel unsafe visiting a facility alone must notify their supervisor.

Facility Safety

SLCP believes that Verifiers, whether internal or external, are ambassadors for the entire program. The expectation is that they demonstrate the highest level of professionalism and execute the work in the highest quality manner, taking every measure required to be safe and ensure the safety of others. It is the responsibility of the Verifier to act in a safe manner when onsite at a facility. Verifiers must exercise best judgment and must not proceed if they feel unsafe.

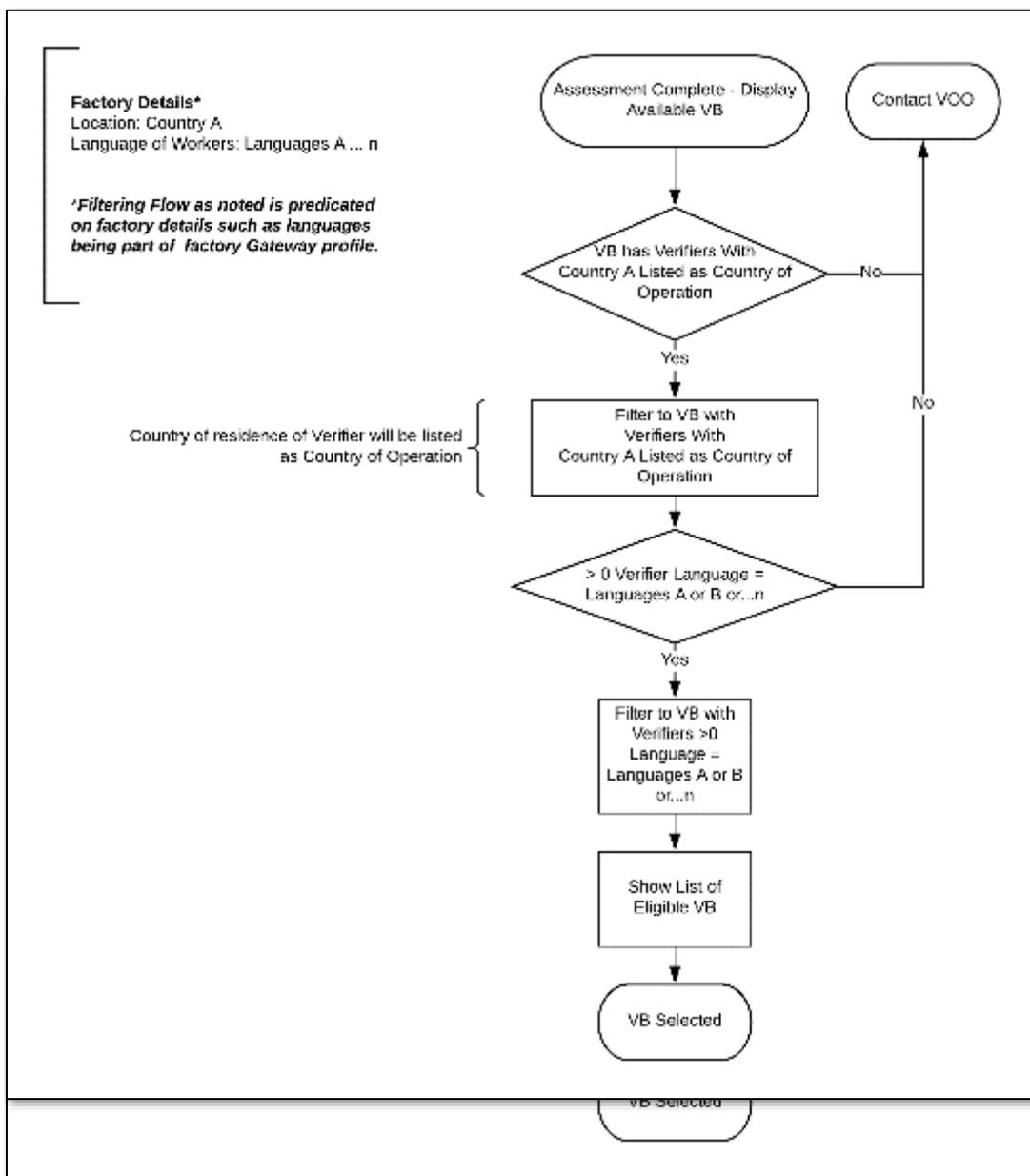
VBs want to ensure that Verifiers:

- Perform all duties in accordance with applicable federal, state, provincial, regional, and other applicable health and safety regulations.
- Follow all site-specific (e.g. facility) safety rules and requirements.
- Act in a safe manner at all times including wearing appropriate clothing and personal protective equipment (PPE) where deemed necessary (hats, suits, gloves, eye protection, etc.). The following PPE is recommended in the following cases. When in doubt, act with caution:
 - Foot protection/ safety footwear (whenever there is risk of crushing or heavy objects dropping onto feet or whenever there is a risk of slipping (e.g. wet areas))
 - Eye protection in areas with potential for flying objects or splashing of chemicals
 - Head protection in areas with the risk of fall hazards
 - Noise PPE to reduce exposure in certain circumstances
- If available, all Verifiers should locate and review the facility or building safety rules/ plans to understand site specific safety risks that may apply within the specific location/ building being visited. Be aware of potential high noise areas
- Watch for machinery or other electrical devices that are not properly plugged in and be aware of frayed or exposed electrical wires. Never touch any electrical fixtures or wires that appear unsafe
- Prior to conducting any inspections that involve heights, or going on rooftops, ensure safety measures are in place, such as safety harnesses
- Refrain from touching, smelling, or making contact with/contacting chemicals. Be aware of chemicals around the facility and use judgment when interacting with these chemicals
- Always be aware of machinery and/or tools with rotating parts.

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Annex II Filtering of Verifier Body and Verifier



In order

to enforce Verification Protocol rules regarding VB and Verifier selection, we are using available technology to filter in advance. Facilities choose the VB on the AH. Below is the flow chart for filtering of VB.

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For Verifier selection, the rule as shown in the flow chart is that the initial Verifier selected must be eligible to verify in the verification country and speak (be listed in Verifier profile) at least one language listed by the facility as a language of the workers (>0 Language – Languages A or -B or ...n). If there is such a Verifier, the VB will show as a possible selection for the facility on the AH.

For example, the factory has listed the following as worker languages:

- English (A)
- French (B)
- Finnish (C)

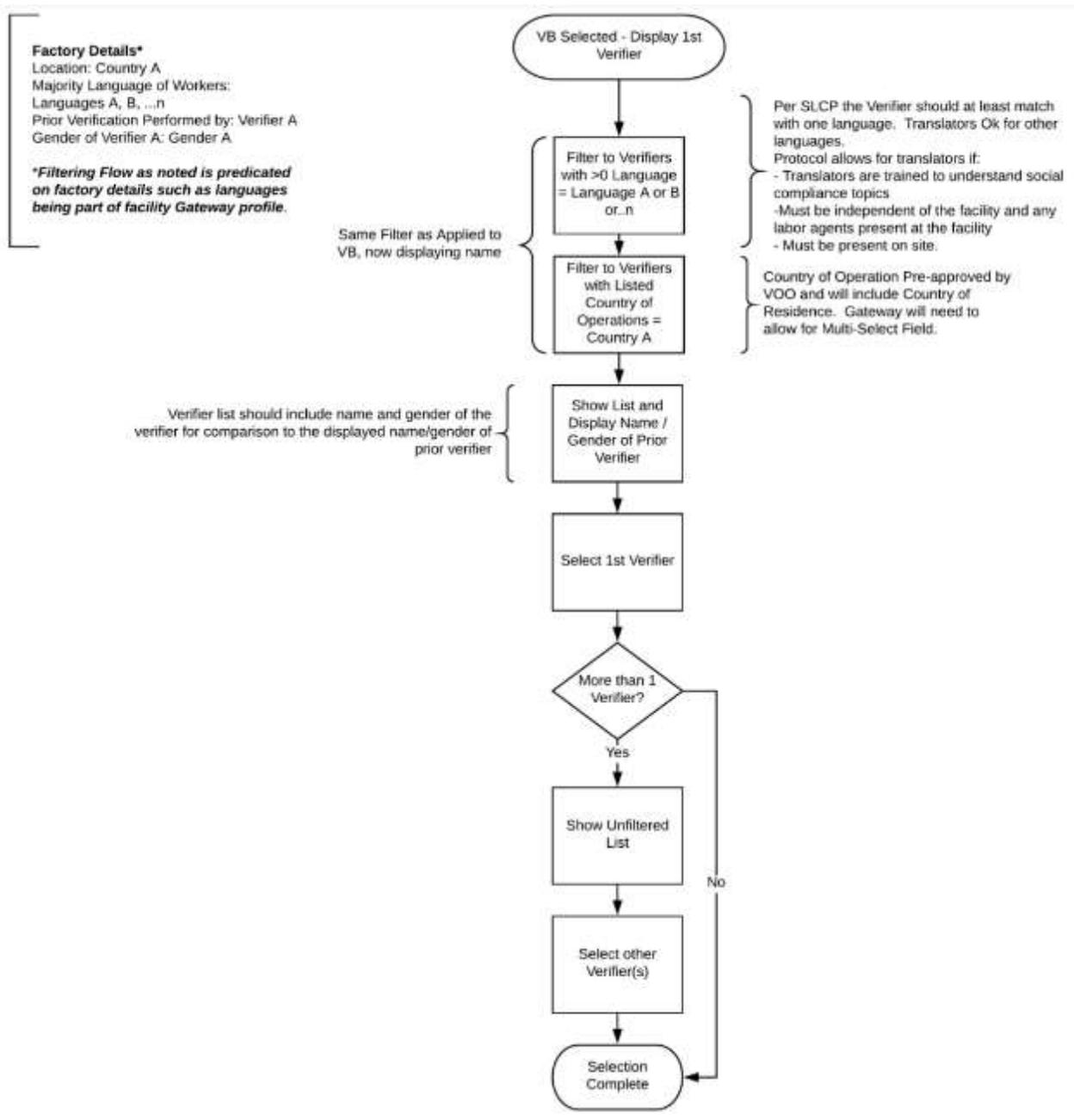
The filter will only show Verifiers that have either A, B or C listed in their profile.

Once a VB is selected by the facility on the AH, the VB selects the Verifier on the Gateway.

To the rightBelow is the flow chart for filtering of Verifiers associated with a VB. ~~Rather than~~The Gateway does not filter by ~~Prior Verification~~prior verification and ~~Gender~~gender, but this data will be visible/transparent to the VB so that they ~~may select based on~~can follow Protocol. Rules- rules and select the appropriate Verifier(s).

Note that the 1st Verifier must be country and language approved while the 2nd Verifier can be approved for any country and language, as translators (according to Protocol rules) are permitted.

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Annex III COVID-19 – Inclusion of COVID-19 Information in Verified Assessment Report

COVID-19 has disrupted supply chains and significantly impacted workplace conditions in facilities. As a result, “Verification Data” for a number of SLCP questions will need to reflect these impacts **in addition to other factors impacting facility operations**.

Table below provides Verifiers with guidance on how to address the SLCP questions most relevant to impacts from COVID-19. The table provides a likely scenario as a heading followed by the sections and data points that are most likely to include a response in reference to COVID-19. The table then provides guidance for facilities and information for the Verifier to include in “Verification Data”.

There may be additional responses to other questions also affected by COVID-19 which are not included in the table, and these will need to be identified by the Verifier and also explained in “Verification Data”; however, the table does provide a strong starting point in helping Verifiers understand what is expected from them when **including** any impacts from COVID-19 in their “Verification Data” responses.

Note: Inclusion of COVID-19 information in “Verification Data” is not a requirement. The information contained in this Annex is to help Verifiers remember to also provide COVID-19 details as a contributing factor to changes in facility operations, where relevant. The below table is included in the Facility Guidance.

If you have any further questions, please contact us via the [SLCP Helpdesk](#).

COVID-19 impact: The facility experiences a change in normal hours of operation / reduction in workforce / terminations / retrenchments / furloughs			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Facility Profile \ Basic Information \ Hours of Operation	FP-BAS-16: Normal Hours of Operation per day:	Facility enters information to reflect normal hours of operation per day during the 12-month self-assessment period; if hours changed due to COVID-19, then enter all hours that are applicable for the 12-month self-assessment period, specifying the months/ days and the normal hours <u>NOTE: Hours of operation refers to a time range (i.e., 9:00 am – 5:00 pm) rather than number of hours (i.e., 8 hours).</u>	Include information about any changes to normal hours of operation from closures, reduced working hours or changes to normal operations

<p>Facility Profile \ Worker demographics \ Workers</p>	<p>FP-WOR-1 [...] FP-WOR-41</p>	<p>Facility enters worker demographics to reflect normal operations during the 12-month self-assessment period; any further facility comments/ notes about changes/ fluctuations in demographics shall be included at the end of the Facility Profile section under FP-FAC-1</p>	<p>Include if there are differences between self-assessment completion and verification are due to COVID-19</p>
<p>Worker Treatment \ Discrimination \ Conditions of Work</p>	<p>WT-DIS-9: Which of the following is a factor in decisions on conditions of work? (SELECT all that apply with a "X"): WT-DIS-9-1: Race / Skin Color WT-DIS-9-2: Sex / Gender WT-DIS-9-3: Religion [...]</p>	<p>"Conditions of work" include hours of work, rest periods, annual holidays with pay, occupational safety and occupational health measures, as well as social security measures and welfare facilities and benefits provided in connection with employment. This question covers any decisions regarding conditions of work, including any decisions due to COVID-19, such as shift selection, access to overtime, etc.</p>	<p>If conditions of work, such as, shift selection, access to overtime, demotion, etc. are impacted by COVID-19, explain if these conditions were ever dependent on factors of: race, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, age, nationality/foreign migrant worker status or family responsibilities.</p>
<p>Termination \ Discrimination \ Termination</p>	<p>TER-DIS-2: Which of the following is a factor in decisions on termination, forced resignation, retrenchment or retirement? (SELECT all that apply with a "X"): TER-DIS-2-1: Race / Skin Color TER-DIS-2-2: Sex / Gender TER-DIS-2-3: Religion [...]</p>	<p>Facility selects all factors involved in determining which workers were terminated, forced to resign, retrenched or retired. This question covers any reasons for termination, forced resignation, retrenchment or retirement including COVID-19</p>	<p>If workers were terminated due to COVID-19, Describe the factors used to decide which workers were terminated (e.g., race, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, age or nationality/foreign migrant worker status)</p>
<p>Termination \ Discrimination \ Absence due to Illness</p>	<p>TER-DIS-3: Have decisions of termination, forced resignation, retrenchment or retirement been dependent upon a worker's</p>	<p>Yes/No This question covers any illness including COVID-19</p>	<p>Explain if COVID-19 was one illness that played a factor in determining decisions of worker termination, forced resignation, retrenchment or retirement.</p>

	absence due to illness?		
Termination \ Employment Practices \ Invalid Reasons	TER-EMP-2-3: Workers were terminated for invalid reasons	Yes/No This question covers any invalid reason including COVID-19	Explain if COVID-19 was a reason for terminating workers
Termination \ Employment Practices \ Suspension / Reduction Workforce	TER-EMP-3: Does the facility comply with legal requirements before suspending workers or reducing the size of the workforce due to economic, technological, structural, operational or other similar changes?	This question considers any legal requirements enacted to protect workers suspended or laid off as a result of a reduction in workforce due to economic, technological, structural, operational or other similar changes This question covers any economic, technological, structural, operational or similar change including COVID-19	Describe what legal requirements were addressed if the facility suspended workers or reduced the size of the workforce due to COVID-19.
COVID-19 impact: The facility experiences a change in payment of wages, termination benefits and/or paid leave for workers affected by COVID-19			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Wages and Benefits \ Wages and Benefits \ Wage Payment	WB-WAG-44: Are wage payments made regularly and on time and in line with legal requirements?	This question addresses regular wage payments, as well as any required payments to workers due to COVID-19, any required hazard pay / incentive pay, etc. If the facility did not pay any wages or other required payments on time, answer NO	Include information on changes to wage payment requirements (including pay due dates) as a result of COVID-19
Termination \ Employment Practices \ Unjust Termination	TER-EMP-1: Does the facility not follow legal requirements when workers resign or are terminated in relation to: [...] • outstanding wages,	Facilities must consider any legal requirements not enacted specifically to protect workers financially who are terminated. This question covers all legally required termination payments, including any	Describe what termination benefits were not paid in line with legal requirements for termination as a result of COVID-19

	<ul style="list-style-type: none"> • termination payments, • termination payments all paid on time, • compensation for unused annual leave, and/or 	legally required payments to assist workers terminated as a result of COVID-19	
Termination \ Unjust Termination Termination \ Outstanding Wages Termination \ Severance Payment Termination \ Timely Termination Payment Termination \ Unused Annual Leave	TER-EMP-2: Please specify which of the items below apply (SELECT all that apply with a "X"): TER-EMP-2-4: Workers were not paid correctly for outstanding wages TER-EMP-2-5: Workers were not paid correct severance payments TER-EMP-2-6: Termination payments were not paid on time TER-EMP-2-7: Workers were not compensated correctly for unused annual leave	These questions cover outstanding wages, severance payments, timely termination payments and unused annual leave requirements not enacted specifically to protect workers terminated for any reason including COVID-19	Describe if workers were not paid correctly for outstanding wages, severance pay and/or unused annual leave, or if termination payments were not paid on time as a result of COVID-19.
Wages and Benefits \ Wages and Benefits \ Leave	WB-WAG-81: Is the facility not paying workers correctly for any of these types of leave as legally required: [...] <ul style="list-style-type: none"> • Sick leave [...] <ul style="list-style-type: none"> • Other types of required leave? 	This question refers to any diagnoses / types of leave including COVID-19	If "Other types of required leave" is selected due to COVID-19 leave, describe the legally required terms of payment. If "sick leave" is selected, describe any legally required special provisions for paid sick leave due to COVID-19.
COVID-19 Impact: The facility experiences an increase in overtime and changes in how working hours are recorded			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Working Hours \	WH-WOR-15: Did any workers work more than 60 hours in total	These questions are in reference to workers working extended hours for any	If the answer to any of these questions is yes, and if overtime was worked due to

<p>Working Hours \ Total Working Hours</p>	<p>(regular + overtime) within any given week? WH-WOR-16: Did any workers work more than 72 hours in total (regular + overtime) within any given week? WH-WOR-17: Did any workers work more than 80 hours in total (regular + overtime) within any given week?</p>	<p>given reason including COVID-19.</p>	<p>COVID-19 impacts, describe this under “Verification Data”. Include details such as whether the overtime was due to a reduced workforce or closures that impacted production planning.</p>
<p>Working Hours \ Working Hours \ Records</p>	<p>WH-WOR-1: How are hours of work recorded for all workers? (SELECT all that apply with a "X"): WH-WOR-1-1: Manually (i.e. written record) WH-WOR-1-2: Mechanically (i.e. punch card) WH-WOR-1-3: Electronically (i.e. swipe card) WH-WOR-1-4: Biometrically (i.e. fingerprint/face scan)</p>	<p>If the facility has changed their method of timekeeping as a result of any reason including COVID-19 (e.g., switching from biometric to manual timekeeping), both methods of timekeeping should be selected.</p>	<p>If the facility has changed their methods of timekeeping (e.g. from biometric to manual) to prevent the spread of COVID-19, indicate that more than one timekeeping system was used due to COVID-19. If the facility uses biometric timekeeping, indicate how the biometric timekeeping system is sanitized to prevent spread of COVID-19.</p>
	<p>WH-WOR-4-4: Start and finish times in the payroll system match exact time in/out in time records</p>	<p>If workers are required to clock in/out before/after the start of their shift and this is not reflected in the payroll, answer No. This question is in reference to workers clocking in/out before/after the start of their shift for any reason, including social distancing due to COVID-19.</p>	<p>If the facility has adjusted payroll to allow for workers to clock in/out before/after the start of their shift due to social distancing rules, describe how much extra time is reflected in workers’ pay.</p>

COVID-19 impact: The facility tests and treats confirmed cases of COVID-19			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Worker Treatment \ Discrimination \ Infection or Illness	<p>WT-DIS-20: Does the facility require other infection or illness tests (e.g., Hepatitis B) at any time during employment?</p> <p>WT-DIS-21: If yes, are these infection or illness tests administered in line with legal requirements?</p>	<p>If the facility requires COVID-19 testing for workers, the answer to this question should be YES</p> <p>Facilities must consider any legal requirements for tests administered for COVID-19</p> <p>This question is in reference to testing for all non-HIV/AIDS related infection or illness, including COVID-19</p>	<p>If the facility is requiring COVID-19 testing, describe the details of the process (when, how often, how, who, etc.).</p>
	<p>WT-DIS-24: Has the facility taken steps to enable workers with infections or illness (other than HIV/AIDS) to retain their work if they were medically able to?</p> <p>WT-DIS-25: Are these steps to help workers with infections or illnesses (other than HIV / AIDS) in line with legal requirements?</p>	<p>If the facility treats workers for COVID-19, the answer to this question should be YES</p> <p>Facilities must consider any legal requirements for individual response to / treatment of COVID-19</p> <p>This question is in reference to treatment of all non-HIV/AIDS related infection or illness, including COVID-19</p>	<p>If the facility is providing treatment for COVID-19, describe the details of the process (when, how often, how, who, etc.).</p>
Health and Safety \ Emergency Preparedness \ Emergency Response Plan	<p>HS-EME-1: Does the facility have a written Emergency Response Plan?</p>	<p>If the facility's emergency response plan includes dealing with the spread of COVID-19 answer YES.</p> <p>Note any local regulations to prevent the spread of COVID-19 that apply to the facility and how the facility is complying with these regulations.</p> <p>This question is in reference to a written</p>	<p>Indicate if the facility has implemented any new procedures for dealing specifically with COVID-19. For example:</p> <ul style="list-style-type: none"> Measures taken to reduce large gatherings of workers such as group trainings and emergency evacuation drills.

		Emergency Response Plan for all emergencies including COVID-19	<ul style="list-style-type: none"> Measures taken to prevent the spread of COVID-19 as workers enter the facility, such as temperature checks. Communications workers receive about COVID-19 and how workers are trained to prevent the spread of COVID-19.
Health and Safety \ Worker Protection \ Imminent Danger	HS-WOR-1: Are workers subject to negative consequences if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	<p>If there are confirmed cases of COVID-19 in the facility and the facility is not taking proper precautions to contain the spread (e.g., temperature checks, testing, masks, social distancing, hygiene measures), and workers are not permitted to refuse work due to safety concerns, the answer should be NO.</p> <p>This question refers to any situation a worker deems to be an imminent and serious danger to life or health, including a lack of safety measures preventing the spread of COVID-19</p>	<p>If there are confirmed cases of COVID-19 at the facility, indicate if the facility allows workers to refuse to work (with or without permission).</p> <p>Workers who have refused to work due to confirmed cases of COVID-19 must be considered when answering this question.</p>
Health and Safety \ First Aid and Medical \ Medical Treatment	HS-FIR-5: Are on-site medical facilities / clinic(s) and staff in line with legal requirements?	<p>Yes/No</p> <p>Facilities must consider any legal requirements for on-site medical facilities / clinic(s) and staff.</p> <p>This question refers to on-site medical facilities / clinic(s) and staff for all medical requirements including COVID-19</p>	Note the number of workers with confirmed cases of COVID-19.
Health and Safety \ First Aid and Medical \ Work-related Accidents	HS-FIR-10: Does the facility record work-related accidents and diseases and report them to the competent authority in line	<p>Yes/No</p> <p>Facilities must consider any legal requirements for recording and reporting</p>	Note the number of workers with confirmed cases of COVID-19.

and Diseases	with legal requirements?	work-related accidents and diseases. This question refers to all work-related diseases including COVID-19	
COVID-19 impact: The facility takes additional preventative methods to prevent the spread of COVID-19			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Health and Safety \ General Work Environment \ Cleanliness, Sanitation & Waste	HS-GEN-10: Are the facility's sanitation practices in line with legal requirements?	If the facility undertakes regular cleaning/sanitizing to prevent the spread of infectious disease such as COVID-19, the answer to this question should be YES. Facilities must consider any legal requirements for sanitary practices related to all infectious diseases. This question refers to all sanitary practices including those specific to COVID-19	Provide details of how the facility's sanitary practices prevent the spread of COVID-19. For example: <ul style="list-style-type: none"> • Re-arranging workstations to be 6 ft apart • Installing barriers between workstations, etc.).
Health and Safety \ General Work Environment \ Toilet / Restroom	HS-GEN-21: Does the facility provide hand washing facilities equipped with clean water and soap, along with a sanitary way for drying hands after washing them?	This question refers to the provision of hand washing and drying facilities for regular sanitation as well as increased measures for infectious diseases including COVID-19.	Indicate if additional hand washing/sanitizing stations have been installed to prevent the spread of COVID-19
Health and Safety \ Worker Protection \ Personal Protective Equipment (PPE)	HS-WOR-3: Are workers provided with Personal Protective Equipment (PPE) in line with legal requirements?	Facilities must consider any legal requirements for the provision of PPE in accident prevention as well as in the spread of infectious disease including COVID-19.	Indicate if workers are provided PPE (masks, respirators, face shields) <u>specifically</u> to prevent the spread of COVID-19. If PPE is provided specifically to prevent the spread of COVID-19, indicate if workers are trained on how to properly use PPE to prevent the spread of

			COVID-19.
Health and Safety \ Dormitories	HS-DOR-2: Does the facility have any of the following measures in place regarding housing/dormitories? (SELECT all that apply with a "X"): HS-DOR-2-2: Housing/dormitories are clean HS-DOR-3: Are housing / dormitories in line with all other health and safety legal requirements?	Facilities must consider any health and safety legal requirements for housing/dormitories specifically for COVID-19. This question refers to all health and safety legal requirements for housing/dormitories including COVID-19.	If the facility has dormitories, indicate any measures the facility has implemented to prevent the spread of COVID-19 in dormitories. Note specifically if the facility has implemented curfews in dormitories to prevent the spread of COVID-19.
Health and Safety \ Canteens	HS-CAN-2-3: Food preparation, storage, and eating areas are kept clean, safe, and hygienic (including temperature, ventilation, light, noise etc.)	This question refers to all measures taken for the clean, safe and hygienic preparation of food, food storage and eating areas, including measures taken specifically to prevent the spread of COVID-19.	If the facility has a canteen, indicate any measures the facility has implemented to prevent the spread of COVID-19 in the canteen.
Health and Safety \ Health and Safety \ Other Legal Requirements	HS-HEAL-1: Are facility practices out of compliance with any legal requirements not covered elsewhere regarding Health & Safety?	Facilities must consider any other legal health and safety requirements not enacted by the facility to protect workers This question covers all legally required health and safety practices including those specific to COVID-19	Indicate any additional legally required health and safety measures not enacted by the facility to prevent the spread of COVID-19 in the workplace.
COVID-19 impact: Changes in the verification process occurred			
Section/subsection of Tool	Data Collection Tool Questions	Facility Guidance	Verification Data
Verification Details \ Verification Details \ Verification Observations	VD-VER-22: Any other comment	N/A	Indicate if COVID-19 had any impact on the verification process, e.g., if certain areas of the facility were not operational.

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Annex IV Verification Communication Template (suggested communication)

Dear Facility Representative,

Thank you for choosing [Verifier Body name] to complete the verification of your [self][joint]-assessment.

Role of the Verifier

SLCP is standard agnostic, which means there is no judgment or scoring of the data. The Verifier's role is to check the correctness and completeness of your information provided in the Data Collection Tool. Our Verifiers and [Verifier Body name] will adhere to the SLCP Code of Conduct. Please find it in the Annex of the [Facility Guidance](#).

Completing your assessment on the Accredited Host platform

Please refer to the [Facility Guidance](#) for details about the verification process and how to complete your assessment. If you want to reduce the time of the onsite verification by permitting the Verifier to engage in virtual or offsite activity, please contact us for more information. If you want us to review policies and procedures before arriving onsite, you can upload documents to the Accredited Host platform. Note, these uploaded documents will be visible in the final verified assessment report and visible to those you share the report with. We ask that you do not upload any sensitive information, such as personally identifiable information relating to your workers, or any proprietary information.

Timeline

The Verifier must receive your completed assessment with applicable uploaded documentation no later than 10 working days prior to the scheduled [verification date] [verification window].

Verification must happen within two months of completion of the self/joint-assessment. The Verifier will check the date in the Data Collection Tool, Facility Profile question FP-BAS-26 Date of self/ or joint-assessment submission (YYYY-MM-DD). If this date is more than two months from the date of verification, you must contact SLCP through the [Helpdesk](#) to change the status of your assessment back to ASI (Assessment Initiated) so you can update the self/joint-assessment.

Verification details

The scheduled [verification date] [verification window] is:

- The number of person-days required to complete the verification are:
- The number of calendar-days we will be onsite are:

If you choose to engage in virtual/offsite verification activities to reduce the onsite verification time and your facility circumstances fit the virtual/ offsite verification requirements, the number of days listed above may be decreased in 0.5 person-day increments.

- We will be sending [number of Verifiers] Verifier[s] to conduct the onsite verification. The Verifier[s] [has][have] the following notable characteristics: [Include information about gender and language capabilities at a minimum]. [Also include information on any applicable trainees, assistants, interpreters or other individuals joining the verification].
- To get in touch with the Verifier[s] you can email [address] or phone [number].

Verification process: What to expect

- During the onsite verification we will conduct a facility tour, check documents and interview both management and workers.
- The Verifier(s) will require access to all areas of the facility and its grounds, photographs (respecting and avoiding proprietary information)
- The Verifier will conduct confidential interviews with workers and management. The interviewing of workers is done as part of their employment and as such, workers should not be financially penalized or retaliated against, abused or harassed in any form for participating in the interview process. Furthermore, during the opening and closing meeting

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it is important that senior management and workers' representatives (as applicable) are present.

- To prepare for the onsite documentation review, please find the attached Document List for your information. We appreciate your cooperation. At the end of the verification, we will conduct a closing meeting to review the verification summary at a high level.
- For more details about the verification process, please read the [Facility Guidance](#).

After the verification: What to expect

We will complete the verified assessment report within ten working days. You should have all information ready for the onsite verification. Only under exceptional circumstances (e.g., non-access to documentation or information due to absence of key management personnel on the days of the verification assessment), may you provide additional information up to two days *after* the onsite verification.

After you have reviewed the verified assessment (14-calendar day window after Verifier completes report) and accepted it, you can share the verified assessment report with anybody you choose via the Gateway or your chosen Accredited Host. As this is not a compliance audit, we will not provide information about corrective action plans.

Concerns or disputes

Should you have concerns or questions about the verified assessment report during your 14-calendar day review period, you can directly reach out to us for clarification. If applicable, we can make edits to the verified assessment report. Edits will only be made with your knowledge and approval. Should you have concerns about the report quality, as it pertains to the Verifier following Protocol or Verifier conduct, you can also raise a formal Dispute and involve the Verification Oversight Organization. For more information about verification oversight, please see: <https://slcp.zendesk.com/hc/en-us/sections/360003592500-Verification-and-Data-Quality>

COVID-19

If your facility is affected or was affected by COVID-19, we will regularly contact you for updates on workforce and facility operations to ensure there are no substantial changes to your [self][joint]-assessment that could affect the onsite verification process. Please note that SLCP has issued a *COVID-19 – Inclusion of COVID-19 information in Verified Assessment Report* document which also contains information for facilities on how to complete the self/joint-assessment. Please find it in the Annex of the [Facility Guidance](#).

For further information about SLCP, please go to <https://slconvergence.org/helpdesk>.

Kind regards,

[Verifier Body name/ Sender name]

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Annex V Document List

List of Documents/Records to be made available to the Verifier(s)

Factory Profile

1. Company Profile
2. Business Registration License
3. Tax Registration
4. Organization chart
5. Land use/construction permit
6. List of Machineries
7. Company vehicle list
8. Production process flow chart
9. List of subcontractors ~~–~~ (if any-applicable)
10. Dormitory details
11. List of Fire equipment
12. Any certificate by any other independent organization like SA8000, ICTI etc.
13. Building approval plan (architectural & structural) from concern Govt. authority; Approved building construction lay out from engineering authority, if applicable
14. Building layout approval from fire service & Fire Occupancy Certificate
15. Worker name list

Recruitment / Hiring & Termination

1. Recruitment policies and procedures & Age verification process
2. Child Labor Remediation Procedure
3. Security Service Contract
4. Training Records other than Health & Safety
5. Work permits (internal /external)
6. Employment Contracts
7. Job announcement/description, job application form, if applicable
8. Labor broker contract & dispatching worker personal records/contract
9. Apprenticeship program (if applicable)
10. Immigrant workers (working permit /visa, passport, contract, personal records)
11. Adolescent workers (registration/approval letter from local labor bureau, health checking record)
12. Termination policy and procedure, training records
13. Worker resignation records

Working Hours

1. Time in/out records (Working hours & overtime hours records)

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2. Production records (Cutting, stitching, quality etc.)
3. Overtime waiver if any
4. Comprehensive working hours permit if applicable
5. Working hours policy including voluntary overtime policy
6. Overtime approval process/procedure and OT request records, if applicable

Wages & Benefits

1. Minimum wage Notification
2. Payroll (Wage records)
3. Full & Final Settlement
4. Leave records
5. Bonus records
6. EOBI (Employees Old Age Benefit) records
7. Social security records & commercial insurance records
8. Receipts showing tax payments / social security remittances to appropriate public agencies
9. Evidence of granting maternity/paternity leave and subsequent return to work
10. Piece rate wages sheet, if applicable
11. Annual leave and any paid leave payment record
12. Bank transferring records (for wages if applicable)

Worker Treatment & Involvement

1. Records from disciplinary procedures
2. Meeting notes from any type of worker/management committee
3. Trade union records
4. Grievance register / Grievance mechanism (procedure, intake channel, investigation/ solution/ feedback records)
5. Org Chart of Trade union, worker/management committee
6. Written policies regarding anti-harassment, physical/sexual/emotional abuse and non-discrimination, no forced labor
7. Freedom of association procedure

Health & Safety

1. Building plan approval / Permit
2. Fire NOC
3. Genset installation approval
4. Building Stability Certificate
5. Appointment of Labor Welfare / Safety Officer
6. Drinking Water Potability test

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7. Boiler License
8. Lift License / Inspection certificate
9. Boiler Operator and Electrician Certificate
10. Noise and Illumination level test Certificate
11. Sanitation Certificate
12. Health Certificate for Workers
13. Doctor / Nurse Appointment Letter
14. First Aid Training Certificate
15. Fire Fighting Training Certificate
16. Fire Mock drill training records
17. Industrial accident records
18. Pollution Control board – Consent order
19. Waste disposal records / Procedures
20. Personal Protective Equipment (PPE) training records
21. Chemical safety training records
22. List of chemicals used (Hazardous / Non-hazardous)
23. Material Safety Data Sheets (MSDS) records
24. Maintenance records of eye wash station
25. Machines maintenance/service records
26. Lock Out/Tag Out survey report, LOTO training records
27. Water Extraction Permit, if applicable
28. Permit for onsite waste disposal
29. License issued by government authority to hazardous waste collector
30. Contract agreement with licensed contractor for hazardous waste collection
31. Hazardous Waste Transfer Contract/ License of Hazardous Waste Handler/License of Hazardous Waste Transporter/Hazardous Waste Manifest, if applicable
32. Waste inventory and tracking records
33. Wastewater monitoring records
34. Flow Chart (indicating all key processes)
35. Drainage layout
36. **Waste treatment equipment's maintenance records**
37. Wastewater Treatment Plant operator certificate, if applicable
38. Approval of waste treatment system i.e. IEE (Initial Environmental Examination) / EIA (Environmental Impact Assessment)
39. Environmental Impact Assessment Reports and Approval / Environmental Protection Acceptance Report / Pollutant Discharge Permit if applicable
40. **Air emissions control equipment's maintenance records**
41. Ozone Depleting Substances (ODS) inventory and maintenance records

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42. Fuel consumption record for factory's transportation
43. Green House Gases (GHG) emissions inventory
44. Emergency response plan including relevant training and drills records
45. Risk Assessment (procedure & records)
46. Banned Chemicals List, if any
47. Vehicle operator licenses for any/all types of motorized vehicles
48. Meeting notes from recent health and safety committee
49. Air receiver is fit to operate certificate
50. Steam receiver is fit to operate certificate
51. Food test reports
52. Accident records / accident analysis records
53. Electrical safety test report
54. Thermographic survey report
55. VOC test reports /Air emission monitoring report if applicable
56. Cooling tower water reports / legionella reports
57. Inspection reports (fire hydrant system, sprinkler, detection system, extinguisher, firefighting equipment, emergency lamps)
58. PPE suitability assessment, PPE selection criteria, PPE list, PPE inspection records
59. Confined space list, confined space entry procedure
60. PCB survey, PCB training records PCB
61. Asbestos survey, training records
62. Food supplier's medical reports
63. PHI report for the canteen
64. Canteen License
65. Hot Work operation procedure
66. Compressed gas cylinder operation procedure
67. Work permits for special & dangerous operations – forklift driver, lift operator, Electrician and Welder, boiler operator

Management Systems

1. Social & Labor Policies and Procedures (including goal/strategy/performance, responsible persons (roles & responsibility, CSR team org chart)
2. Factory rules and regulations / Employee handbook
3. EHS policy & procedure
4. Communication and training records for workers, suppliers, subcontractors
5. Internal audit records and improvement plan

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Annex VI SLCP Code of Conduct

Document Verifiers agree to during Verifier qualification process:

SLCP expects individuals vetted and approved through the Verification Oversight Organization (VOO) to follow the principles outlined in the *SLCP Code of Conduct*.

Conflicts of interest and impartiality

SLCP verifications must be impartial and avoid conflicts of interest that, in fact or in appearance, may create an incentive to report anything other than the true and accurate facts gathered during the SLCP verification.

Corruption

Verifier Bodies shall manage risks and ensure compliance with all applicable laws related to corrupt practices.

Integrity

Members must Verifier Bodies shall promote a culture of integrity to address audit integrity and bribery risks that may exist before, during and after each social compliance audit.

Confidentiality

Members Verifier Bodies must maintain confidentiality with respect to information gathered while executing a social compliance audit, in order to minimize the possibility of inadvertent disclosure, and take reasonable steps to prevent unauthorized access to information collected during or relating to an audit.

Competence

Personnel

Verifier Bodies shall only deploy social compliance audit personnel (whether direct employees or independent contractors) who demonstrate, at a minimum, the relevant knowledge, skills and attributes outlined in the SLCP [Competency Framework, QA Manual and VB Requirements](#) and are going to act in accordance with the Code.

Supervision

Verifier Bodies shall ensure all their personnel are adequately supervised to ensure all work is performed as directed and supports the verified assessment data.

Verified Assessment Data and Records

Report Generation and Submission

Verifier Bodies shall ensure an accurate, concise, and clear verified assessment report, signed off by an SLCP approved Verifier and Verifier Body, is provided to the facility.

Supporting Documents

Verifier Bodies shall ensure each verified assessment report is supported by evidence demonstrating the work performed in sufficient detail to support the information deemed as accurate or inaccurate in the final dataset.

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Handling of Sensitive Information

Sensitive issues, such as abuse or harassment which may lead to retaliation against workers, or attempts to bribe, threaten or coerce Verifiers shall be handled with utmost care to protect workers and Verifiers.

[SLCP requires any relevant information related to this topic to be shared with the VOO via a specific form \(see Section 3.6.\).](#)

Record Management

Verifier Bodies shall have systems in place to ensure all data is collected, stored and transferred in compliance with applicable law, is secure and only accessible by authorized persons.

Obligations to SLCP and VOO

Transparency with SLCP and the Verification Oversight Organization (VOO)

Upon request by SLCP and/or the VOO, true and accurate information shall be made available by Verifier Bodies to verify conformance with SLCP expectations.

Accountability

Verifier Bodies shall develop and uphold principles which reflect integrity and professional ethical behavior as outlined in this document. They will comply with all applicable laws and regulations, policies and procedures, follow professional business practices, and have processes in place for handling complaints and appeals.

Verifiers

~~In SLCP's Competency Framework,~~ Verifiers are committed to act in accordance with items in this document. All Verifiers, shall comply with all relevant legislation, policies and procedures, and maintain the integrity of the Code.

Verifiers are only able to carry out verification as part of an approved Verifier Body.

Obligations of SLCP and VOO

Privacy and Data Protection

SLCP and VOO shall only collect information from Verifiers and Verifier Bodies that is necessary to determine their eligibility to participate in SLCP. This information will only be accessed by SLCP and selected VOO employees, as required in the execution of their duties, unless express permission is given by the Verifier or Verifier Body. SLCP complies with international data collection, privacy and security standards requirements, and ensures all information is collected and maintained in a way which protects the privacy of the Verifiers and Verifier Bodies.

Openness

SLCP and VOO will provide public access to, or disclosure of, appropriate and timely information about the SLCP process, and status (i.e., the granting, extending, maintaining, renewing, suspending, reducing the scope of, or withdrawing of permission to act) of any Verifier, in order to gain confidence in the integrity and credibility of the process. Openness is a principle of access to, or disclosure of, appropriate information.

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Annex VII Additional On-site Verification Information

Walkthrough/ Onsite Observation

SLCP recommends interacting with the workers during the walkthrough by asking them to demonstrate things, like:

- Where is your nearest fire exit?
- Who is your fire warden?
- How do you transfer this chemical into that pot?
- How do you move this fabric to that shelf?

Some important areas to consider are:

- Site perimeter: facility external premises and immediate perimeter of the facility, including loading bays, waste storage, chemical storage, emergency assembly points, sub-facilities, canteens, dormitories or any other accommodation provided to workers by the facility, even if not in the same location
- Fire safety plans and equipment, evacuation notification system and route markings, and emergency exits
- Actions of workers towards cleanliness and safety
- Attitude of line supervisors and department heads towards workers
- Location and capacity of clocking in & out machines and/or attendance records
- Production lines
- Hygiene facilities including toilets, hand washing, hand drying and potable water
- Raw materials storage, finished goods storage, areas and access control procedures
- Boiler room and compressor house
- Power generator (if any)
- Wastewater treatment plant (if any)
- Internal and external transport area (if applicable) and shuttle buses (if provided by company)
- Checking the roof (if possible)
- Any locked rooms that the Verifier was not able to access (if any concerns)
- Additional areas that may or may not be present include confined spaces, elevators, childcare facilities, medical clinic, canteen or kitchen

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Worker Interviews

SLCP expects all Verifiers to already be experienced in interviewing techniques before they are approved to carry out verifications.

Key principles for achieving good quality of information:

- **Representation:** seek a variety of views across all types of roles within the facility
- **Outliers:** identify those persons likely to represent the highest/ lowest scale of a given practice such as working hours or wages
- **Seniority:** include the newest workers to understand the orientation process
- **Leadership:** connect with worker representatives such as union officials or committee members or any type of elected representative
- **Efficient approach:** be courteous on the amount of time for an interview, recognizing that the time represents potential earnings to the worker (and his/her work group)

SLCP recommends the selection of interviewees with these qualities in mind (illustrative only – each facility will vary):

- New hires
- Workers under probation
- Young workers
- Apprentice/ student workers
- Union/ worker representative
- Pregnant workers
- Workers returning from maternity leave
- Workers from any other vulnerable group
- Temporary/ contract workers
- Fixed term/ non fixed term contract workers
- Workers from different departments, different salary levels, different job positions
- Workers of various nationalities (including migrant workers and foreign contract workers)
- Persons performing hazardous work such as chemical storage and disposal
- Relatively gender-balanced, ensuring representation in the case of a small minority

To make the most of the interviews, SLCP recommends the following process:

- Interviews should take place the morning of the first day of verification, with further interviews taking place in the middle and towards the end of the verification to corroborate information the Verifier has found.
- Discussions should take place in a quiet, private area away from management offices with no representatives of management present.
- Informal discussions should also take place during the physical tour of the employment site, at lunch time or during breaks, with care not to prevent workers from eating or taking appropriate rest.

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- Explain the purpose of the verification and that all interview information will be unattributed.
- Begin the interview process with questions that are most likely to elicit routine and uniform data such as contracts, the orientation process and emergency evacuation practice, to validate that worker experiences are consistent with documentation. If the early data is consistent, then eliminate those questions in favor of issues where more variance is expected.
- Focus conversations on issues that are likely to vary by position and supervisor such as: enforcement of safety rules, disciplinary process, grievance procedure, harassment, use of contractors on site and assignment of overtime.

Be aware that the individuals involved may not directly address sensitive issues. Because of that, it can be useful to ask whether workers in another area potentially experience problems like harassment or intimidation by supervisors. This second-hand information may indicate an opportunity to expand the interview sample, and if corroborated or if other workers second-hand repeat the same information must be added to verification data in the appropriate section.

Management Interviews

Management interviews should be used to gain better understanding of:

1. General overview of facility management (who is in charge of what)
2. How the facility is organized (e.g. departments, sections, lines)
3. How workers are managed (e.g. line leaders, supervisors, department managers)
4. What the facility management see as risks to their business
5. How workers are managed throughout the employment cycle (e.g. recruitment, onboarding, payment, leave, termination)
6. Human resources policies and procedures
7. How workers communicate issues to management
8. Health and safety policies and procedures are

Some general guidance around management interviews:

- Try to determine in advance which facility personnel you will need to speak with and when
- Use the opening meeting to confirm their availability and adjust as necessary
- Ask open ended questions to gather data
- Try to keep management interviews conversational rather than a series of yes/no questions
- If management shares information that requires follow up, ask additional questions and use triangulation with record review and worker interviews as necessary
- **Manage your time effectively: be respectful of facility management's schedules and also be aware of how much time you have allotted to complete the verification**
- Be polite but firm if management tries to influence the outcomes of the verification

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- If during the interview you find inaccuracies or non-compliances with applicable legal requirements, share this information immediately and do not wait till the closing meeting
- Remain impartial: it is not the role of the Verifier to enforce requirements or a specific compliance standard).

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